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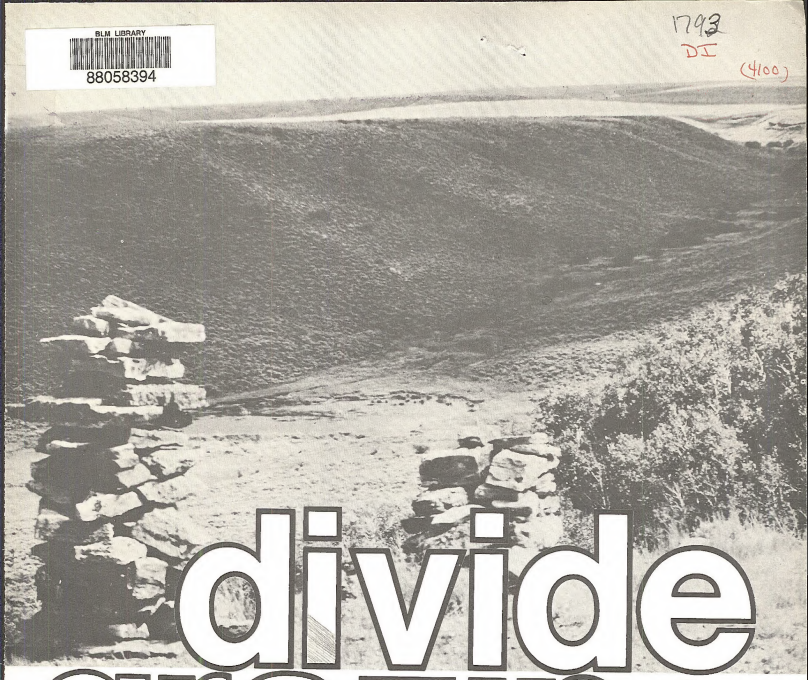

divide grazing

final environmental impact statement

HD
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United States Department of the Interior Bureau of Land Management Rawlins District, Wyoming

BUREAU OF LAND MANAGEMENT
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United States Department of the Interior

BUREAU OF LAND MANAGEMENT

Wyoming State Office
P.O. Box 1828
Cheyenne, Wyoming 82003

IN REPLY
REFER TO:
1792 (934)

Dear Reviewer:

Enclosed for your information is the Final Divide Grazing Environmental Impact Statement.

The Bureau of Land Management (BLM) proposes to allow livestock grazing on approximately 2,099,160 acres of public land in the Divide Resource Area, Rawlins District, Wyoming. The Proposed Action is to manage grazing allotments at various levels of intensity to maintain, improve, or prevent deterioration of present conditions. The Proposed Action includes changing grazing treatments and seasons of use, making adjustments in use levels, and providing additional grazing management facilities and land treatments pending the results of monitoring. Three alternatives are also analyzed in detail. They are Enhanced Livestock Grazing, No Action (Continuation of Present Management), and Enhance Watershed, Wildlife, and Soil Resources. The No Livestock Grazing alternative was considered, but not analyzed in detail. The reasons for this are stated.

The final EIS has been printed in an abbreviated format consistent with the National Environmental Policy Act regulations. This document should be used in conjunction with the Divide Draft EIS, which is still available. Requests for copies should be sent to: Rawlins District, Attention: EIS Team Leader, Bureau of Land Management, P. O. Box 670, Rawlins, WY 82301.

This final document consists of a summary of the impacts, text changes for each chapter, an expanded list of public participation, and a public comments and responses section. Changes and modifications are based on public input. Your comments are welcome on this final EIS to assist us in the decisionmaking process.

We extend our thanks to those individuals and organizations which provided suggestions and comments on the draft. Your help has been invaluable in the preparation of the final EIS and will assist us to more effectively manage the public lands.

Sincerely yours,

Maxwell T. Lieurance

Maxwell T. Lieurance
State Director

Enclosure

ID:88058394

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FINAL

ENVIRONMENTAL IMPACT STATEMENT

PROPOSED GRAZING MANAGEMENT PROGRAM FOR THE DIVIDE EIS AREA

CARBON, NATRONA, AND SWEETWATER COUNTIES, WYOMING

Prepared by:
U.S. DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
RAWLINS DISTRICT 1983

Raymond T. Lierance

STATE DIRECTOR
WYOMING STATE OFFICE

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PREFACE

The Final Divide Grazing EIS has been printed in an abbreviated format consistent with the National Environmental Policy Act regulations. This Final EIS must be used in combination with the Draft EIS. The Final EIS includes a summary of the Draft EIS, written comments received during the public review process and the responses to these comments, and a list of text changes.

SUMMARY

This EIS is an analysis of the effects of proposed and alternative livestock grazing management on approximately 2,099,160 acres of public land administered by the Bureau of Land Management, Rawlins District, in Wyoming. This document will be used in determining future grazing management, based on the principles of multiple use and sustained yield.

MAJOR ISSUES

Prior to preparation of this EIS, a scoping process was conducted to identify significant issues. This scoping process involved contact and/or consultation with all grazing permittees and numerous federal, state and local agencies as well as a mailing of the Proposed Action and alternatives to 485 individuals or companies and public meetings in the Wyoming towns of Baggs, Saratoga and Rawlins.

Based on this scoping process, the following major issues were identified. They are generally listed in the order received.

1. Seasonal distribution of wildlife in regard to livestock seasonal use and wildlife use on private lands.
2. Length of time required before Category C options are implemented.
3. Lack of a specific time schedule and manner of implementing the Proposed Action on each allotment.
4. Creation of unavailable land for livestock use because of energy development.
5. Unsatisfactory reclamation on energy development areas.
6. Failure to notify permittees about oil and gas site examination.
7. Inadequate consultation, cooperation and coordination among ranchers, BLM and Wyoming Game and Fish Department concerning planning and management programs.
8. Need to establish a balance among numbers of grazing animals.
9. Excessive numbers of wild horses.
10. Exclusion of the "no grazing" alternative in the EIS (this issue received the most concern).
11. Opposition to eliminating the "no grazing" alternative from the EIS.
12. More emphasis given to wildlife recommendations than to livestock needs.
13. Consideration of the current situation when determining the climax ecological condition of vegetation.
14. Importance of adequate monitoring results.
15. Encouraging livestock grazing on public lands.
16. Planning for protection of wetlands, riparian, and aquatic areas.
17. Seasonal protection of raptors.
18. Planning as an end in itself; lack of implementation.
19. More consideration is given to wildlife and livestock than to wild horses.
20. Inadequate mathematical models for livestock economics.
21. Ecological site conditions rating not reflecting range productivity; introduced plants may be very productive.
22. Grazing effects being positive as well as negative.
23. Enhancing livestock grazing as the preferred alternative.
24. Inadequacy of SCS range site guide for livestock grazing management in some areas.
25. Opposition to use of the Soil Vegetation Inventory Method in the EIS analysis.

PROPOSED ACTION AND ALTERNATIVES

Introduction

In this EIS, BLM analyzed three alternatives (Enhance Watershed, Wildlife, and Soil Resources; Enhanced Livestock Grazing; and No Action), in addition to the Proposed Action. Also, the affected environment has been described, and the environmental consequences of the Proposed Action and alternatives have been discussed.

In the rangeland management section of the Divide Management Framework Plan (MFP), the grazing allotments were divided into three categories, based on an evaluation of multiple-use characteristics of each allotment: Category M allotments, for which BLM's objective is to maintain the existing situation; Category I allotments, for which BLM's objective is to correct significant problems; and Category C allotments, for which BLM's objective is to manage them custodially, while still protecting existing resource values.

For each category, recommendations were made for the degree of grazing management, including specific, multiple-use objectives for management of the resources; range improvement and monitoring use; and actions needed to improve and maintain rangeland conditon and productivity.

Proposed Action

BLM's Proposed Action is to continue present management until additional data from a proposed monitoring program becomes available. This will include actions that have been planned before the EIS. After the monitoring program has been completed, management actions, which will be based on all available data, will be implemented.

Enhance Watershed, Wildlife, and Soil Resources Alternative

Under this alternative, allotments would be categorized as in the Proposed Action. Those allotments which have significant conflicts among livestock grazing and watershed, soils, and/or wildlife would receive priority for intensified management. Present management would continue in most allotments and monitoring studies would be set up as in the Proposed Action. Watersheds with documented current or potential problems would receive priority for monitoring.

Grazing management actions (vegetative conversions or treatments, developments, grazing plans, etc.) would be designed to enhance wildlife habitat and the community it supports. Wildlife numbers would be expected to remain at their present levels. Changes in the existing livestock management program, including livestock conversions and range improvement projects, would not be allowed unless they were beneficial to or would not adversely affect the soils, water or wildlife habitat resources. As management actions were implemented, adjustments in livestock grazing rates and/or distributions might be made.

Enhanced Livestock Grazing Alternative

Under this alternative, allotments would be categorized as in the Proposed Action. Forage for domestic livestock would be increased through an accelerated program of range improvements. Suitable allotments would be placed under allotment management plans (AMPs), and livestock would have priority in forage allowances. Other resources would not be degraded. They would be protected by standard operating procedures, mutliple-use regulations and law.

No Action Alternative

Under this alternative, the existing range management program would remain the same. AMPs in effect would continue, but there would be no new range improvement projects. Maintenance of existing improvements would be allowed. Changes in AUMs, seasons of use, or class of livestock from the present situation would not be allowed. Population objective levels for wildlife and wild horses would not change. Maintaining the present use of vegetation would allow BLM and the public to look at the consequences of continuing the existing rangeland uses in the Divide EIS area.

Preferred Alternative

The Preferred Alternative is the Proposed Action.

TIME SCHEDULE FOR RANGE MANAGEMENT ACTIVITIES

Figure S-1 shows the time schedule for various range management activities and proposed activities discussed in the DEIS.

LONG-TERM ENVIRONMENTAL CONSEQUENCES

In Table S-1 of the final EIS, the projected long-term environmental consequences are compared. This information provides a basis for choice among the various options. For more detailed descriptions of the effects of the Proposed Action and alternatives, refer to the Environmental Consequences sections in Part 2 of the DEIS.

TABLE S-1

COMPARATIVE SUMMARY OF PROJECTED LONG-TERM[1] ENVIRONMENTAL CONSEQUENCES OF THE PROPOSED ACTION AND ALTERNATIVES
[0's indicate baseline data or no change, +'s indicate degree of increase, -'s indicate degree of decrease]

Resource	Present Situation	Proposed Action	Enhance Watershed, Wildlife and Soil Resources	Enhanced Livestock Grazing	No Action
Vegetation					
Production	0	++	++	++	-
Condition	0	+	+	+	-
Soil stability					
Best case	0	+++	++++	+	0
Worst case	0	0	+++	-	-
Water (Quantity/Quality)	0	+	++	0	0
Socioeconomics					
Direct impacts					
Net revenues	0	+	+	++	-
Indirect impacts					
Employment	0	+	+	+	-
Regional income	0	+	+	+	-
Social impacts	0	0	-	0	0
Average Benefit/Cost Ratio	0	2.40:1	1.81:1	2.48:1	1.90:1
Wildlife					
Nongame	0	+	+++	+	-
Small game	0	+	++	+	-
Big game					
Bighorn Sheep	0	0	0	0	0
Elk	0	0	0	0	0
Mule deer	0	0	0	0	0
White-tailed deer	0	+	+	+	0
Pronghorn	0	0	0	0	0
Upland game birds	0	+	++	+	0
Waterfowl	0	+	++	+	0
Wild horses	20,271 AUMs	+	-	-	0
Fisheries	0	++	+++	0	0
Cultural	0	+	+	-	0
Visual	0	-	+	-	0
Recreation					
Visitor days	41,500	+	+	--	0
Quality	0	0	++	---	0

[1]The definition of long term varies, depending on the resource. For specific information, refer to the appropriate section on Environmental Consequences, Part 2 of this document.

PREFERRED ALTERNATIVE

BLM's Proposed Action is to continue present management until additional data from a proposed monitoring program becomes available. This will include actions that have been planned before the EIS. After the monitoring program has been completed, management actions, which will be based on all available data, will be implemented.

In this EIS, BLM analyzed three alternatives (Enhance Watershed, Wildlife, and Soil Resources; Enhanced Livestock Grazing; and No Action), in addition to the Proposed Action. Also, the affected environment has been described, and the environmental consequences of the Proposed Action and alternatives have been discussed.

In the rangeland management section of the Divide Management Framework Plan (MFP), the grazing allotments were divided into three categories, based on an evaluation of multiple-use characteristics of each allotment: Category M allotments, for which BLM's objective is to maintain the existing situation; Category I allotments, for which BLM's objective is tocorrect significant problems; and Category C allotments, for which BLM's objective is to manage them custodially, while still protecting existing resource values.

For each category, recommendations were made for the degree of grazing management, including specific, multiple-use objectives for management of the resources; range improvement and monitoring use; and actions needed to improve and maintain rangeland condition and productivity.

LIST OF PREPARERS

TEAM LEADER, Bob Tigner
Responsibility: Overall Direction and Management

ARCHEOLOGIST, Michael T. Bies
Responsibility: Cultural Resources

CARTOGRAPHIC TECHNICIAN, Shelley Peele
Responsibility: Cartography

RANGE CONSERVATIONIST, Andy Warren
Responsibility: Cover Photograph

ECONOMIST, Tom Crawford
Responsibility: Socioeconomics and Livestock

FISHERIES BIOLOGIST, Fred Stabler
Responsibility: Fisheries

ILLUSTRATOR, Carol Ross
Responsibility: Cover Design

OUTDOOR RECREATION PLANNER, Gary Long
Responsibility: Recreation and Visual Resources

RANGE CONSERVATIONIST, Chuck Ashton
Responsibility: Wild Horses, Socioeconomics and Livestock

RANGE CONSERVATIONIST, Michael R. Holbert
Responsibility: Vegetation

SOIL SCIENTIST, Steve Howell
Responsibility: Soils

SOIL SCIENTIST, Steve Strenger
Responsibility: Soils

TECHNICAL ADVISOR, Bud Holbrook
Responsibility: Review

TECHNICAL COORDINATOR, Kirby Boldan
Responsibility: Team Coordination

WILDLIFE BIOLOGIST, Larry Saslaw
Responsibility: Wildlife

CONSULTATION AND COORDINATION

COORDINATION WITH OTHER AGENCIES

The following agencies were sent copies of the DEIS for their reivew. Those who provided comments are noted by an asterisk (*).

Federal

U.S. Department of Agriculture
  Forest Service
  Soil Conservation Service

*Environmental Protection Agency

U.S. Department of Interior
  *Fish and Wildlife Service
  *National Park Service
  Geological Survey
  Bureau of Reclamation

State

*Department of Environmental Quality
*Geological Survey of Wyoming
New Mexico State University, Department of Agricultural Economics and Agricultural Business
*Office of Governor Herschler
*State Engineer's Office
*State Historic Preservation Office
Wyoming Board of Land Commissioners
*Wyoming Game and Fish Department
Wyoming Recreation Commission
University of Wyoming, Division of Agricultural Economics

Local

Carbon County Planning and Zoning Board
Sweetwater County Planning and Zoning Board
City of Rawlins
Town of Dixon
Town of Baggs

PUBLIC PARTICIPATION

The following organizations, companies, permittee/lessees, and individuals were consulted or expressed interest in the Divide MFP or EIS. They were provided a copy of the DEIS. Those who provided comments are noted by an asterisk (*).

Organizations

*American Horse Protection Association, Inc.
*American Society for the Preservation of Mustangs and Burros
*Carbon County Stock Growers Association
*Continental Divide Trail Society
*Defenders of Wildlife
Divide EIS Monitoring Committee, an affiliate of the Carbon County Stockgrowers Association
*International Society for the Protection of Mustangs and Burros
League of Women Voters of Wyoming
*Natural Resources Defense Council, Inc.
Nature Conservancy
Wild Horse Organized Assistance
Wyoming State Grazing Board

Companies

Amoco Production Company
Atlantic Richfield Company
Chevron USA, Inc.
Cities Service Gas Company
Colorado Interstate Gas
First Wyoming Bank of Rawlins, N.A.
Lonesome Fox Corporation
Marathon Oil Company
*Petroleum Association of Wyoming
Rawlins National Bank
Rocky Mountain Energy
Rocky Mountain Oil and Gas Association, Inc.
Rocky Mountain Scout
The Kemmerer Coal Company
Tri-State Generation and Transmission Association, Inc.
Western Nuclear, Inc.
Upland Industries Corporation

CONSULTATION AND COORDINATION

Permittees/Lessees

Steve Adams (Eliza Solace)
Steve Adams (Adams and Adams)
Margaret Anderson
Pauline Annis (Oscar T. Annis)
Ken Assay (Wyoming Game and Fish Department)
Garland Bartlett
Jim Berger
Jim Berger (Colonial Coins, Inc.)
Mrs. Jack Boyer (Jack Boyer)
Rick Boyer (Richard and Rick Boyer)
L.A. Brazell (L.A. Brazell and Margaret Semon)
L.A. Brazell
Kenneth E. Carrico
John T. Cobb
Tom Cobb (Cobb Cattle Company)
*Jim Collins
Dennis Compton (Centennial Valley Ranch Company)
Ray J. Corbett (Louis Larsen Sheep Company)
Donald Corson
Mills Craig
Harry Duncan (Duncan Ranch)
Roy Echeverria (Echo Springs Livestock Company)
Sophie Echeverria
Bob Elliott (M. Taylor Laurence, Jr.)
F.B. Espy (Blake Sheep Company and F.B. Espy)
Phillip Espy (Espy Livestock Company)
L.V. Eversole
Ernest Forsberg
Pete Georgiou (Pete and Hazel Georgiou)
Robert Grieve (Battle Mountain Company)
Tom Grieve (LaClede Land and Livestock)
Reino Hakala (Olson Sisters Corporation)
Niels Hansen (P.H. Livestock Company)
Leonard Hay
Frank Hill (Hill Land and Livestock Company)
Dick Hiser
Dick Hiser (Plattoga Ranch)
Stan Jolley
William Jolley
Lee Jons
Roy Jons
Carl Kerbs (Kerbs Four Bars Herefords)
Peter Larsen (Martha Larsen)
Goerge Lowham (Sierra Madre Ranch)
John Lufkin (Energy Development Company)
John Lufkin (N.R. Petry and 4900, Inc.)
John Lunt
John MacPherson (Riner Ranches)
Andrew Maneotis (Maneotis Sheep Company)
Earl Martin (ZIZ Ranch)
Wayne L. Martin
C.W. McIlvaine (Tullis Land Company)
Bill R. McKee
C.A. McKee, Jr.
Frank Miller (Miller Estate Company)
Tye Moore (Tye Moore, et al.)
Sam D. Morgan
Sam D. Morgan (Sam D. Morgan and Thomas Grieve)
John Niland (Niland, McDonough, Niland)
Ken Olson (Olson Ranch, Inc.)
Walter Olson
Robert G. Orchard
Steve Page (Elmer Short)
Francis Pearson (Rife Ranch)
Andy Peroulis
John Peroulis (Winslett Ranch, Inc.)
John Peroulis (John and Catherine Peroulis)
Elmer Peterson
Roger Pilgram (Roger and Margaret Pilgram)
Dean Plaster (Estate of Mary Blair)
Stuart Quealy (Quealy Livestock Company)
Robert Rasmussen
*Gary Raymond (Carbon County Stockgrowers Association)
Roy Raymond (Ferris Mountain Ranch)
Jeff Reid (Boyer Ranch)
Ed Richner
Curtis Rochelle
Harry Russell (Umbrella Ranch, Inc.)
George Salisbury (Salisbury Livestock Company)
George R. Salisbury, Jr.
Kelly Sewell (Lazy C 2 Bar Ranch)
Kelly Sewell (International WYCO Cattle Company)
George O. Sheehan
Mike Sheehan
Patrick Sheehan
John Smith (Showalter and Smith Land and Livestock)
John Smith (Smith Rancho, Inc.)
Mrs. Raymond E. Smith (Raymond E. Smith)
James Stevenson
Theo and Katherine Stoddart
Donald Stratton (Sandstone Sheep Company)
Robert Stratton (Stratton Sheep Company)
Bernard Sun (Sun Land and Cattle Company)
Charles Swanson (Swanson Ranch and Implement Company)
Vernon T. Swanson
Bruce Thayer (Edith Thayer)
J. Burton Tuttle
Vern Vivion (Rocky Mountain Sheep Company)
Eugene and Marilyn Walck
Frank Waliser (Waliser Ranches, Inc.)
Jack Weber

CONSULTATION AND COORDINATION

Ray and Sid Weber (Weber Ranch, Inc.)
Phil Weber
Nelson E. Wren, Jr.
Jim York (Silver Spur North Ranch)
William Edward Young

Individuals

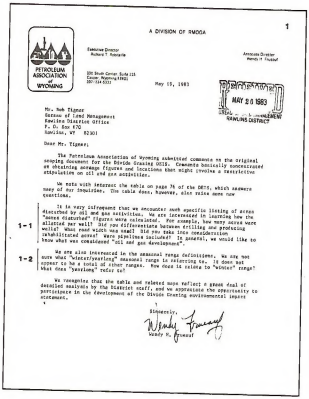
Lee Airheart
Frank Alguire
J.C. Arnold
Bev Behrends
Joseph R. Bohne
Ed Brehar
Gary D. Brown
Winston Bryon
L. Cabrera, Sr.
J.R. Chidley
Richard E. Cooper
Larry DiBrito
Elmer Erickson
Sherrod France
Darrell E. Gothard
Wilford N. Hemmert
Greg Hiatt
Paul J. Hickey
Lois Higley

John Johnson
Randy H. Johnson
Mrs. Roy Jons
Ty Kaisler
John Litzenberger
*Dick Loper
*William McIntosh
LaVerda Mann
Casey McKee
Mrs. Frank Miller
Leona Miller
Mark Miller
Rod S. Miller
Margaret Mitchell
Randy Montgomery
Kathleen and Tom Moore
Warren Murphy
Donald Nelson
Carl K. Olson
Martha Page
Gerald Palm
Norman Palm
Bob Pappenheim

Jeff Powell
Wight M. Raffin
Daryl Remeyn
Phil Riddle
Linda Sanchez
Joyce B. Saeh
Chuck Sanger
Donna M. Smith
Kathleen Sun
Steve Sun
Harry B. Tipton
Tom Trowbridge
W.M. Trover
Carol J. Uhl
Clint Withrow
James R. Wolf
Lawrence W. Young II

PUBLIC COMMENTS AND RESPONSES ON THE DRAFT ENVIRONMENTAL IMPACT STATEMENT

Each letter received is presented in full with a response, where appropriate, following each letter. Each comment and response has been numbered.



1

A DIVISION OF RMOGA

PETROLEUM ASSOCIATION of WYOMING

Executive Director
Richard T. Rompotis

Associate Director
Wendy H. Howard

234 South Center, Suite 115
Casper, Wyoming 82601
307/234-5333

May 19, 1983

RECEIVED
MAY 20 1983
BLM
CARLINS DISTRICT

Mr. Bob Tigner
Bureau of Land Management
District Office Office
P. O. Box 870
Rawlins, WY 82301

Dear Mr. Tigner,

The Petroleum Association of Wyoming submitted comments on the original scoping document for the Divide Grazing DEIS. Comments basically summarized an obtaining acreage figures and locations that might involve a restrictive stipulation on oil and gas activities.

We were both interest the table on page 74 of the DEIS, which answers many of our inquiries. The table does, however, also raise some new questions.

1-1 It is very infrequent that we encounter such specific listing of acres disturbed by oil and gas activities. We are interested in learning how the "acres disturbed" figure was calculated. For example, how many acres were allotted per well? Did you differentiate between drilling and producing wells? What road width was used? Did you make a distinction between rehabilitated acres? Were pipelines included? In general, we would like to know what was considered "oil and gas development".

1-2 We are also interested in the seasonal range definitions. We are not sure what "winter/yearlong" seasonal range is referring to. Is there not either to be a total of other ranges. How does it relate to "winter" range? What does "yearlong" refer to?

We recognize that the table and related maps reflect a great deal of detailed analysis by the Rawlins staff, and we appreciate the opportunity to participate in the development of the Divide Grazing environmental impact statement.

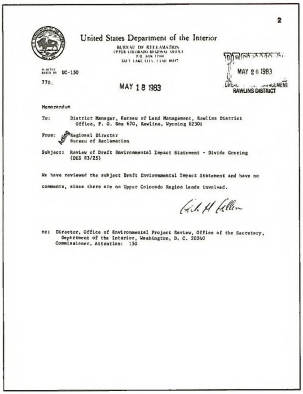
Sincerely,

Wendy H. Howard

RESPONSES TO LETTER NO. 1

1-1 The acres disturbed figures listed in Table 2-10 were considered to be all drilling and related support activities (roads and pipelines) and were calculated from BLM right-of-way files and field measurements. Each right-of-way and well pad was plotted and overlayed on the various big game seasonal range maps, planimetered for distance, and multiplied by an average width or size. Field measurements included actual pad size, road width and pipeline width on approximately 8 percent of the existing producing and nonproducing oil and gas wells (50). The average well pad measured 5.01 acres; pipelines averaged 51 feet in width, and roads averaged 50 feet in width. Rehabilitated acres were not considered since we were attempting to assess total disturbance. We do not have data to determine the extent of the total acreage that has been rehabilitated.

1-2 Winter/yearlong seasonal ranges refer to those acres that support big game animals during the year, with higher concentrations of animals during the winter. These areas, however, do not normally support significant concentrations of animals and are not considered "crucial" to maintaining populations at objective levels.



2

United States Department of the Interior

BUREAU OF LAND MANAGEMENT
(FILE LOCATION REGIONAL OFFICE)
(ADDRESS)
(ATTENTION)

IN REPLY REFER TO: WY-150

3730

MAY 18 1983

MAY 20 1983

LAND MANAGEMENT
RAWLINS DISTRICT

Memorandum

To: District Manager, Bureau of Land Management, Rawlins District Office, P. O. Box 870, Rawlins, Wyoming 82301

From: Regional Director
Bureau of Reclamation

Subject: Review of Draft Environmental Impact Statement - Divide Grazing (DES 83-23)

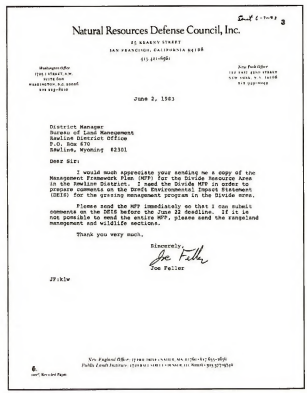
We have reviewed the subject Draft Environmental Impact Statement and have no comments, since there are no Upper Colorado Region lands involved.

Gilbert H. Heller

cc: Director, Office of Environmental Project Review, Office of the Secretary, Department of the Interior, Washington, D. C. 20240
Commissioner, Attention: 130

RESPONSE TO LETTER NO. 2

Thank you for your comments.



3

Natural Resources Defense Council, Inc.

81 ELEVENTH STREET
SAN FRANCISCO, CALIFORNIA 94103
(415) 621-0651

Washington Office
1725 I STREET, N.W.
SUITE 600
WASHINGTON, D.C. 20006
202 783-7800

New York Office
122 EAST 42ND STREET
NEW YORK, N.Y. 10168
212 949-0049

June 7, 1983

District Manager
Bureau of Land Management
Rawlins District Office
P.O. Box 870
Rawlins, Wyoming 82301

Dear Sir:

I would much appreciate your sending me a copy of the Management Framework Plan (MFP) for the Divide Resource Area in the Rawlins District. I need the Divide MFP in order to prepare comments on the Draft Environmental Impact Statement (DEIS) for the grazing management program in the Divide area.

Please send the MFP immediately so that I can submit comments on the DEIS before the June 22 deadline. If it is not possible to send the entire MFP, please send the rangeland management and wildlife sections.

Thank you very much.

Sincerely,

Joe Feller

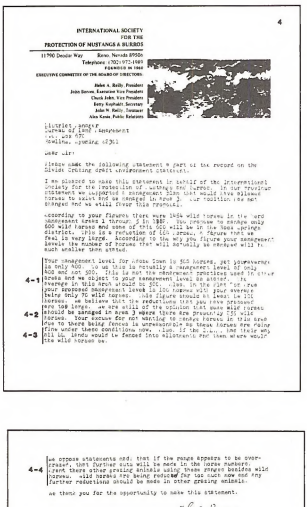
JF:klw

6.
over Revised Page

New England Office (212) 949-0049 NEW YORK, NY 10168 (617) 523-8010
Pacific Coast Office (213) 820-1800 LOS ANGELES, CA 90071 (415) 621-0651

RESPONSE TO LETTER NO. 3

We forwarded the MFP for rangeland management and wildlife to you on June 7, 1983.



4

INTERNATIONAL SOCIETY
FOR THE
PROTECTION OF MUSTANGS & BURROS

11700 Double Way Reno, Nevada 89506
Telephone: (702) 677-1085
FOUNDED IN 1966

EXECUTIVE COMMITTEE OF THE BOARD OF DIRECTORS:

Helen A. Reilly, President
John Reese, Executive Vice President
Chuck John, Vice President
Betty Kaufhold, Secretary
John W. Reilly, Treasurer
Alice Kane, Public Relations

Libraries, Secretary
Bureau of Land Management
[illegible, Nevada 89701

Dear Sir:

Please make the following statement a part of the record on the Elko Grazing Permit Renewal(s) Hearing.

I am pleased to make this statement in behalf of the International Society for the Protection of Mustangs and Burros. In our previous statement we suggested a management plan that would give balance horses to start and we changed to Area 2. Our position has not changed and we still favor this proposal.

According to your figures there were 1414 wild horses in the 4 management areas 1 through 4 in 1980. You propose to manage only 600 wild horses and some of this 600 will be in the Ruby Springs district. This is a reduction of 814 horses. I figure that we should be able to manage up to the 900 you figure your management levels; the number of horses that will actually be managed will be much smaller than stated.

Your management level for cross Down in BLM horses, per interviews with Mr. Ford, is 100 horses with your average 1980 use at 200 to 250. This is not the historical records and I have 4-1 books and we object to your management level as stated. In fact, your proposed management levels in 100 horses will your average 1980 use. We believe this is a reduction that should be explained. We believe that the reduction should be less 4-2 more 100 horses. We are still of the opinion that more wild horses should be managed in Area 3 where there are presently 175 wild horses. Your excuse for not wanting to create horses in this area 4-3 is that there are fences in unfavorable by these horses are going thru other livestock fences now. Also, if the [illegible] and their wild kin, herds would be fenced into allotments for them where would the wild horses be.

4-4 We oppose statements said, that if the range appears to be overgrazed, that further cuts will be made in the horse numbers. We want there other grazing animals asked to take their benefits while the horses are taking their cuts. Nothing for the horses now and any further reductions should be made in other grazing animals.

We thank you for the opportunity to make this statement.

John C. Reese
John C. Reese
Executive Vice President

cc: Helen Reilly

RESPONSE TO LETTER NO. 4

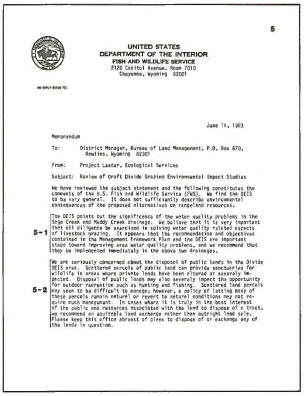
4-1 BLM was in error stating that the average number of horses would be 400 for Adobe Town and 70 for the Flat Top area. See text changes for pages 19 and 20 of the DEIS.

The management level of 500 horses for the Adobe Town area is considered to be the optimum level. The same is true for the management of 100 horses in the Flat Top area. The Adobe Town Wild Horse Herd Management Area Plan (HMAP) specified that if the optimum number of horses (500) were exceeded for a period of more than one year, the population should be reduced to 300.

4-2 The text has been modified to better explain our proposed management of wild horses in area 3. See text change for page 20 of the DEIS.

4-3 When fence construction is proposed, an environmental analysis is completed to assess the action. If wild horses were present in the area, the analysis would include an assessment of the impact to horses.

4-4 We have clarified our statements on adjustment of wild horse numbers. See text changes for pages 96 and 97 of the DEIS.



5

UNITED STATES
DEPARTMENT OF THE INTERIOR
FISH AND WILDLIFE SERVICE
2120 Capitol Avenue, Room 7015
Cheyenne, Wyoming 82001

IN REPLY REFER TO:

June 14, 1983

Memorandum

To: District Manager, Bureau of Land Management, P.O. Box 670, Rawlins, Wyoming 82301

From: Project Leader, Ecological Services

Subject: Review of Draft Divide Grazing Environmental Impact Studies

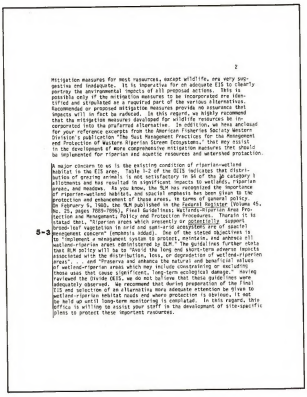
We have reviewed the subject statements and the following constitutes the Fish and Wildlife Service's (FWS) comments. The DEIS and the FEIS to be very general. It does not sufficiently describe environmental consequences of the proposed alternatives on rangeland resources.

The DEIS points out the significance of the water quality problems in the Sage Creek and Muddy Creek drainages. We believe that the proposed land exchanges should be examined as solving water quality related aspects of livestock grazing. It appears that the recommendation and objectives contained in the Management Framework Plan and the DEIS are important steps toward improving area water quality problems, and we recommend that they be implemented immediately in the above two drainages.

5-1

We are seriously concerned about the disposal of public lands in the Divide DEIS area. Scattered parcels of public land can provide sanctuaries for wildlife in areas where private lands have been altered or severely impacted. Disposal of public lands may also severely impact the opportunity for outdoor recreation such as hunting and viewing. Isolated public parcels are also difficult to manage. However, we recognize that certain ways of these parcels remain natural or revert to natural conditions may not require much management. In cases where it is truly in the best interest of the public and resources associated with the land to dispose of a tract, we recommend an equitable land exchange rather than outright land sale. We have not seen this office adequate of plans to dispose of or exchange any of the lands in question.

5-2



2

Mitigation measures for most resources, except wildlife, are very successful and inadequate. It is imperative for an adequate EIS to clearly portray the significance of impacts. The DEIS indicates that [illegible] of riparian-wetland habitats, and special emphasis has been given to the protection and enhancement of these areas, in terms of general policy. On February 6, 1980, the BLM published in the Federal Register (Volume 45, No. 25, pages 7809-7896), Final Guidelines: Wetlands-Riparian Area Protection. These guidelines were developed to implement Executive Order 11990. In total they, "direction areas which presently or potentially support broad-leaf vegetation in arid and semi-arid ecosystems are of special management concern" (pages 7810). One of the stated objectives is to "implement a management system to protect, maintain, and enhance all wetland-riparian areas in a manner consistent with the Multiple Use Mandate that BLM policy will be to 'Hold the long and short-term adverse impacts associated with the distribution, loss, or degradation of wetland-riparian areas'; . . . and 'Preserve and enhance the natural and beneficial values of wetland-riparian areas which may include constraining or excluding livestock grazing from these areas.'" Since the Draft EIS was published before the Divide DEIS, we do not believe that these guidelines were adequately observed. We recommend that during preparation of the Final EIS and selection of an alternative more adequate attention be given to wetland-riparian habitat needs and where protection is obvious, it not be held up until long-term monitoring is completed. In this regard, this office is willing to assist your staff in the development of site-specific plans to protect these important resources.

5-3

RESPONSES TO LETTER NO. 5

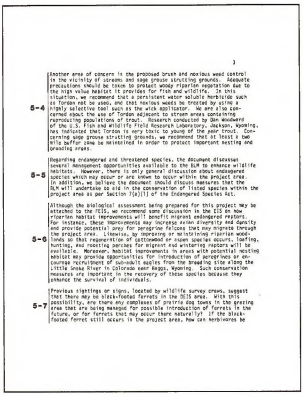
5-1 The quality of the Sage and Muddy Creek drainages is of major concern to the bureau's range and wildlife programs. Each grazing management action and monitoring plan will reflect this concern by incorporating applicable riparian and water quality objectives. A Wildlife Habitat Management Plan (HMP) has been prepared and some initial work started in the Sage Creek Basin, and a University of Wyoming research project is being considered in the Muddy Creek drainage.

5-2 Each tract of public land eligible for sale will undergo intensive inventory and analysis to determine wildlife values and trade-offs. Your office will be informed of each sales and will have the opportunity to review each environmental analysis.

5-3 The Divide Resource Area is gathering site-specific information, initiating further consultation with livestock operators and other involved parties and developing HMPs to implement management actions for the benefit of wetland-riparian habitats, where appropriate. Where further information is required, studies are being conducted. However, where existing information indicates potential improvement through management and where livestock operators are providing input and cooperation, riparian mangement is being pursued.

5-4 Each application of herbicides on BLM public lands is thoroughly reviewed before implementation and is considered in an environmental analysis in which stipulations such as appropriate buffer strips around riparian areas may be developed. Application techniques are rigidly controlled near sensitive areas. Persistent chemicals, such as Tordon, are used only when it can be shown there are no other more environmentally desirable chemicals or techniques that will achieve the desired results.

5-5 Procedures for proper consideration of threatened and endangered species of wildlife under Section 7(c) of the Endangered Species Act of 1973 (as amended, 1981), have been established between the BLM and U.S. Fish and Wildlife Service (USFWS). These procedures are being



Another area of concern is the proposed brush and noxious weed control in the vicinity of streams and sage grouse strutting grounds. Adequate precautions should be taken to protect woody riparian vegetation due to the high value habitat it provides for fish and wildlife. In this situation, we recommend that a persistent water soluble herbicide such as Tordon 22K be used in lieu of Tordon pellets. Tordon 22K is a highly selective tool with its use with application. We are also concerned about the use of Tordon adjacent to stream areas containing reproducing populations of trout. Research conducted by Don Woodward of the U.S. Fish and Wildlife Field Research Laboratory, Jackson, Wyoming, has implicated that Tordon is very toxic to young of the year trout. Concerning sage grouse strutting grounds, we recommend that at least a 660 foot buffer zone be established in order to protect important nesting and brooding areas.

Regarding endangered and threatened species, the document discussed several management opportunities available to the BLM to enhance wildlife habitat. However, there was no discussion of potential adverse endangered species which may occur or are known to occur within the project area. In addition, we believe the document should discuss measures that the BLM will undertake to aid in the conservation of listed species within the project area as per Section 7(a)(1) of the Endangered Species Act.

Although the biological assessment being prepared for this project may be attached to the FEIS, we recommend some discussion in the EIS on how riparian habitat improvements will benefit migrant endangered raptors. For instance, these improvements may increase avian diversity and density and provide additional nesting, perching, and foraging habitat through the project area. Likewise, by improving or establishing riparian woodlands so that regeneration of cottonwood or aspen species occurs, loafing, hunting, and roosting species for migrant and wintering raptors will be available. Moreover, habitat improvements in areas with potential roosting habitat will benefit migrant bald eagles. Finally, we recommend that encourage reintroduction of non-native species from the breeding site along the little Snake River in Colorado near Baggs, Wyoming. Such conservation measures are important in the recovery of these species because they enhance the survival of individuals.

Previous sightings or clues, tendered by wildlife survey crews, suggest that there may be black-footed ferrets in the FEIS area. With this possibility, are there any complexes of prairie dog towns in the grazing area that are being managed for possible introduction of ferrets in the future, or for ferrets that may occur there naturally? If the black-footed ferret still occurs in the project area, how can herbivores be

6-4

6-5

6-6

6-7

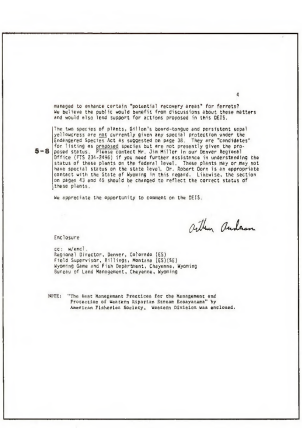
followed, per the agreement between USFWS (Helena Field Office) USFWS and the BLM (Wyoming State Director). Appropriate comments regarding threatened and endangered species and the adequacy of the Threatened and Endangered Biological Assessment are expected from that office.

5-6 The biological assessment determined that neither the Proposed Action nor any of the alternatives are expected to have any effect on the three endangered species listed in the USFWS memorandum. A detailed analysis of each management plan, range improvement project or structure will be required on a case-by-case basis to adequately evaluate impacts to threatened and endangered species.

We concur with your comments that improved riparian management will benefit migrant and nesting peregrine falcons and bald eagles. The importance of maintaining or improving these habitat types was stressed throughout the Wildlife section of the EIS. The effects of better riparian management will be of great benefit to these two threatened and endangered species through long-term maintenance of important habitat and prey species availability.

We have forwarded a copy of the biological assessment to your office as well as the USFWS field office in Helena.

5-7 Although a black-footed ferret skull was found in the EIS area in 1981, no confirmed ferret sightings have been documented for the area since 1973. BLM is continuing to survey prairie dog towns and is using the new search techniques developed near Meeteetse, Wyoming. BLM is also cooperating with the USFWS Coop Unit to study various habitat components of the Meeteese ferret population as well as other areas where evidence of ferrets has been found. BLM has not ruled out the possiblity of ferrets occurring in the EIS area, and all prairie dog towns are searched for ferrets before any major surface disturbance occurs. BLM is continuing to work closely with the USFWS, Office of Endangered Species in Helena, Montana, to ensure that endangered species are not jeopardized in any land-use decision.



managed to enhance certain "potential recovery areas" for forage?
We believe the public would benefit from discussions about these matters
and would also lend support for actions proposed in this DEIS.

The two species of plants, Gilia's (sand-tongue and persistent scrub
buttercup) are not currently given any special protection under the
Endangered Species Act as suggested on page 30. They are "candidates"
for listing as proposed species but are not presently given the pro-
posed status. Please contact Mr. Jim Miller in our Denver Regional
Office (FTS 234-2546) if you need further assistance in understanding the
status of these plants on the federal level. These plants may or may not
be considered by the State of Wyoming. We suggest that you establish
contact with the State of Wyoming in this regard. Likewise, the section
on pages 43 and 45 should be changed to reflect the correct status of
these plants.

6-8

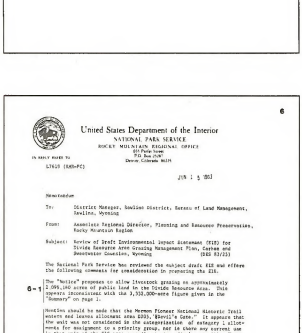
We appreciate the opportunity to comment on the DEIS.

Arthur Andersen

Enclosure

cc: w/encl
Regional Director, Denver, Colorado (ES)
Field Supervisor, Billings, Montana (ES/SC)
Wyoming Game and Fish Department, Cheyenne, Wyoming
Bureau of Land Management, Cheyenne, Wyoming

NOTE: "The Host Management Practices for the Management and
Protection of Western Riparian Stream Ecosystems" by
American Fisheries Society, Western Division was enclosed.



United States Department of the Interior
NATIONAL PARK SERVICE
ROCKY MOUNTAIN REGIONAL OFFICE
655 Parfet Street
P.O. Box 25287
Denver, Colorado 80225

IN REPLY REFER TO:
L7619 (RMR-PC)

JUN 1 5 1983

Memorandum

To: District Manager, Rawlins District, Bureau of Land Management, Rawlins, Wyoming

From: Associate Regional Director, Planning and Resource Preservation, Rocky Mountain Region

Subject: Review of Draft Environmental Impact Statement (FES) for Divide Resource Area Grazing Management Plan, Carbon and Sweetwater Counties, Wyoming (DES 83/23)

The National Park Service has reviewed the subject draft EIS and offers the following comments for consideration in preparing the FIS.

6-1 The "Waiver" proposes to allow livestock grazing on approximately 2,099,160 acres of public land in the Divide Resource Area. This is substantially different from the 3,330,000-acre figure given in the "Summary" on page i.

6-2 Mention should be made that the Mormon Pioneer National Historic Trail enters and leaves allotments nos 0205, "Devil's Gate," it appears that the BLM has adequately protected the trail in these areas by prescriptive allotments for management to a relatively great degree, but in Chapter III, "Environment," in that unit of the EIS area corresponding to Appendix 1, page III- There are, however, 27 miles of interior and 20 miles of exterior fences noted on range improvements on public lands shown in Appendix 2, page 120.

6-3 The Oregon National Historic Trail enters the Divide Resource Area (still re-stricted to Natrona County, 1978, 1979 and 1980). BLM has adequately protected on public land from any disruptive grazing systems. Land Status and Grazing Allotment Boundaries Map 2, Township 33N, Range 88W, Section 36 identified that Section as State land. The BLM Public Land User has titled Devil's Gate 7 shows that Section 36 is privately owned. We would appreciate knowing if this State school section has indeed been leased by the State of Wyoming for the purposes of coordinating management of the national historic trail.

6-4 The Divide Resource Area contains two potential National Natural Landmarks--Washakie Basin and Shale of Lance. Further project planning should consider these potential candidates for designation so that it does not adversely affect the ecological and geological features of these areas. We also recommend that a brief discussion of the National Natural Landmarks program and the Nationwide Rivers Inventory, both administered by the

5-8 Thank you for the clarification. The text has been changed on pages 38, 43 and 45.

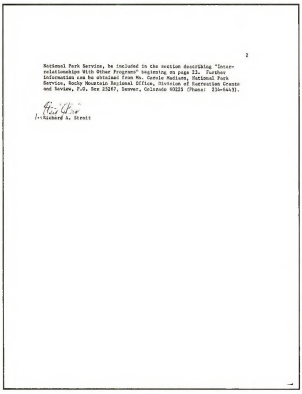
RESPONSES TO LETTER NO. 6

6-1 The correct figure is 2,099,160 acres. Page 1 of the DEIS has been changed to reflect this.

6-2 Through the allotment categorization process, the Devil's Gate allotment (0205) was placed within the maintain or "M" category by BLM. Present grazing management practices are considered acceptable and are not creating significant management problems.

The current livestock grazing use of the Devil's Gate allotment, as shown, has been incorporated into Appendix 1.

Allotment Number	Class of and Season of Use	Active	Suspended Nonuse	Total	Permit/ Lease
0205	Cattle 03/01 to 02/28	18,617	0	18,617	3



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National Park Service, be included in the section describing "Inter-relationships With Other Programs" beginning on page 21. Further information can be obtained from Ms. Carole Mallett, National Park Service, Rocky Mountain Regional Office, Division of Recreation Grants and Review, P.O. Box 25287, Denver, Colorado 80225 (Phone: 234-6439).

Richard A. Strait

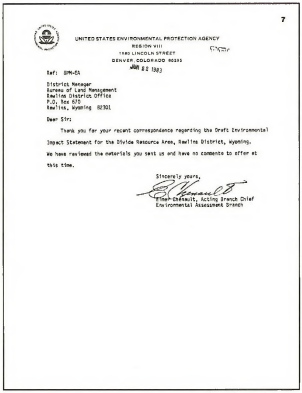
BLM must complete an environmentral assessment (EA), which describes the beneficial/adverse impacts an action would have on the natural resources and mitigation measures before approval of a management action. Any management action would be subject to the conditions outlined in the Standard Operating Procedures on page 26, paragraph 3 of the DEIS. Utilizing the interdisciplinary approach, an archeologist will describe any adverse impacts an action may have on the Mormon Pioneer National Historic Trail and recommend mitigation measures, thus protecting the trail resources. The fencing is south of Highway 220; the Mormon Trail is north of the highway in the Divide area.

Subsequent investigation has shown that section 36 of T. 29 N., R. 88 W., is private land.

6-3 These two potential National Natural Landmarks were not included in the Divide DEIS because they would not be affected by the proposed grazing actions or alternatives. Regardless of the livestock grazing management program chosen for the Divide area, these landmarks would not be adversely affected by future livestock grazing management practices. Range improvements would be constructed in a manner that would not cause adverse impacts to the environment. The Washakie Basin has a large number of existing range improvements that have been of considerable benefit to both wild horses and wildlife. Future projects would have similar objectives.

Existing land management policies will continue to protect ecological or geological features. A portion of the Washakie Basin known as the Adobe Town area is currently classified as a Wilderness Study Area (WSA) and consequently receives protection beyond that provided by normal policies.

6-4 See text change for page 23 of the DEIS.



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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION VIII
1860 LINCOLN STREET
DENVER, COLORADO 80295

Ref: 8PM-EA

District Manager
Bureau of Land Management
Rawlins District Office
P.O. Box 670
Rawlins, Wyoming 82301

Dear Sir:

Thank you for your recent correspondence regarding the Draft Environmental Impact Statement for the Divide Resource Area, Rawlins District, Wyoming.

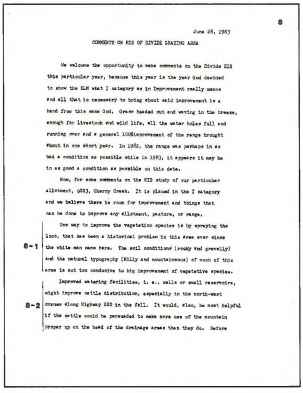
We have reviewed the materials you sent us and have no comments to offer at this time.

Sincerely yours,

Hugh DeHaitt, Acting Branch Chief
Environmental Assessment Branch

RESPONSE TO LETTER NO. 7

Thank you for your comments.



8

June 28, 1983

COMMENTS ON BIA OF DIVIDE GRAZING AREA

We welcome the opportunity to make comments on the Divide EIS this particular year, because this year is the year God checked to show the BLM what I category as in improvement really means and all that is necessary to bring about said improvement is a hand from this same God. Grass needed cut and waving in the breeze, enough for livestock and wild life, all the water holes full and running over and a general BLMimprovement of the range brought about in one short year. In 1982, the range was perhaps in as bad a condition as possible while in 1983, it appears it may be in as good a condition as possible on this date.

Now, for some comments on the EIS study of our particular allotment, 0803, Cherry Creek. It is placed in the I category and we believe there is room for improvement and things that can be done to improve any allotment, pasture, or range.

8-1 One way to improve the vegetation species is by spraying the loco, that has been a historical problem in this area ever since the white men came here. The soil conditions (rocky and gravelly) and the natural tpography (hilly and mountainous) of much of this area is not too conducive to big improvement of vegetative species.

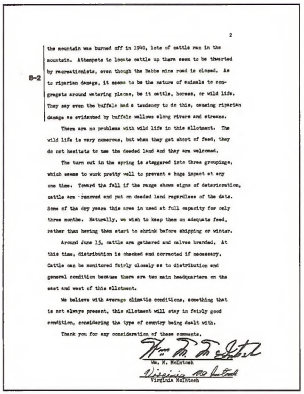
8-2 Improved watering facilities, i. e., wells or small reservoirs, might improve cattle distribution, especially in the north-west corner along Highway 220 in the fall. It would, also, be most helpful if the cattle could be persuaded to make more use of the mountain ranges up at the head of the drainage areas that they do. Before

RESPONSES TO LETTER NO. 8

8-1 Controlling infestation of loco (Astragalus species) is the responsibility of the Carbon County Weed and Pest Control District. Requests for control of loco should be sent to:

Carbon County Weed and Pest Control District
Attention: Larry Justesen
District Supervisor
607 Rodeo
Rawlins, Wyoming 82301

8-2 As identified in Appendix 3 of the DEIS (page 127), development of water sources has been suggested as a potential range management action in order to improve distribution of grazing animals for the Cherry Creek allotment.



2

the mountain was turned off in 1990, lots of cattle can be in the
mountain. Attempts to locate cattle on there seem to be thwarted
by reconstituents, even though the Bates site road is closed. As
8-2 to riparian damage, it seems to be the nature of animals to con-
gregate around watering places, be it cattle, horses, or wild life.
They say even the buffalo had a tendency to do this, causing riparian
damage as evidenced by buffalo wallows along streams and streams.

There are no problems with wild life in this allotment. The
wild life is very numerous, but when they get short of feed, they
do not hesitate to tame the deeded land and they are welcomed.

The turn out in the spring is staggered into three groupings,
which seems to work pretty well to prevent a huge impact at any
one time. Toward the fall if the range shows signs of deterioration,
cattle are removed and put on deeded land regardless of the date.
Some of the dry years this area is used at full capacity for only
three months. Naturally, we wish to keep them on adequate feed,
rather than having them start to shrink before shipping or winter.

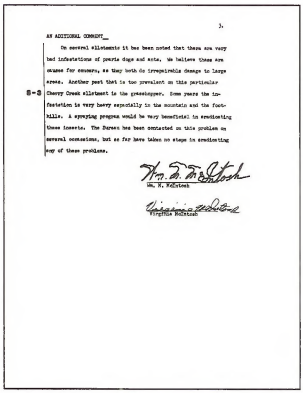
Around June 15, cattle are gathered and calves branded, at
this time, distribution is checked and corrected if necessary.
Cattle can be monitored fairly closely as to distribution and
general condition because there are two main headquarters on the
east and west of this allotment.

We believe with average climatic conditions, something that
is not always present, this allotment will stay in fairly good
condition, considering the type of country being dealt with.

Thank you for any consideration of these remarks,

Wm. R. McIntosh

Virginia McIntosh



3.

AN ADDITIONAL COMMENT__

On several allotments it has been noted that there are very
bad infestations of prairie dogs and ants. We believe these are
causes for concern, as they both do irreparable damage to large
areas. Another pest that is too prevalent on this particular
8-3 Cherry Creek allotment is the grasshopper. Some years the in-
festation is very heavy especially in the mountain and the foot-
hills. A spraying program would be very beneficial in eradicating
these insects. The Forest has been contacted on this problem on
several occasions, but as far have taken no steps in eradicating
any of these problems.

Wm. R. McIntosh

Virginia McIntosh

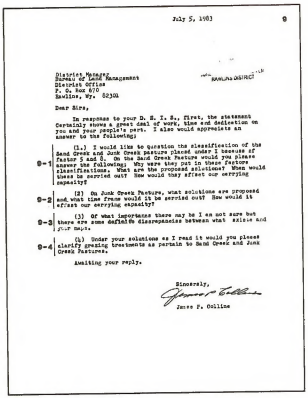
Specific locations and types of range improvements will be identified through consultation with the permittee/lessee, other affected parties and BLM. Methods of controlling livestock in riparian areas and on the Ferris Mountains should also be discussed in detail by all interested individuals and BLM during preparation of management actions for the Cherry Creek allotment.

8-3 Rodent damage control is addressed in the Rawlins District Animal Damage Control Plan. Control of prairie dog infestations is the joint responsiblity of the BLM and the U.S. Fish and Wildlife Service (USFWS). Once a written request for control of prairie dogs is received, BLM assesses the problem and completes a black-footed ferret search of the area. If no signs of ferrets are found, BLM forwards the request for control to the USFWS. The decision to implement control measures, the type of methods to be used, etc. would be made by the USFWS. When a grazing permittee/lessee determines that prairie dogs are causing substantial damage to public lands, he or she should contact the appropriate BLM Area Manager that has jurisdiction for that area.

Control of grasshopper infestations is the responsibility of the Animal and Plant Health Inspection Service of the Department of Agriculture. Requests for or questions concerning control of grasshoppers should be addressed to:

D. M. Hardy
U.S. Department of Agriculture
Animal and Plant Health Inspection Service
Room 8004
Federal Center
Cheyenne, Wyoming82001

To the the best of our knowledge, there is no federal or state agency responsible for controlling ants.



July 5, 1983 9

District Manager
Bureau of Land Management
District Office
P. O. Box 670
Rawlins, Wy. 82301

RAWLINS DISTRICT

Dear Sirs,

In response to your D. E. I. S., first, the statement Certainly shows a great deal of work, time and dedication on you and your people's part. I also would appreciate an answer to the following:

9-1 (1.) I would like to question the classification of the Sand Creek and Junk Creek pasture placed under I because of Factor 2 and 6. On the Sand Creek Pasture would you please answer the following: Why were they put in these factors classifications. What are the proposed solutions When would these be carried out? How would they affect our carrying capacity?

9-2 (2) On Junk Creek Pasture, what solutions are proposed and, what time frame would it be carried out? How would it affect our carrying capacity?

9-3 (3) Of what importance there may be I am not sure but there are some definite discrepancies between what Allen And I've seen.

9-4 (4) Under your solutions as I read it would you please clarify grazing treatments as pertain to Sand Creek and Junk Creek Pastures.

Awaiting your reply.

Sincerely,

James F. Collins

RESPONSES TO LETTER NO. 9

9-1 The Sand Creek allotment was placed in the "I" category after consultation with your son, Jim Collins. BLM officials and Mr. Collins agreed that because there is a livestock distribution problem within the allotment, it should be placed in the "I" category.

About one-half of the allotment consists of a plateau that receives very little livestock use during the summer months because there is no water. We believe that development of a water source on the plateau would result in a more even distribution of livestock, ultimately improving the condition and increasing the carrying capacity of the allotment. When this water development could occur depends on the results of our proposed monitoring, our funding limitations, and the priority assigned the proposed improvement in relation to other improvements proposed in the EIS area. Carrying capacity adjustments, if needed, will be determined after completion of the monitoring studies.

9-2 The Junk Creek allotment was also placed in the "I" category after consultation between Jim Collins and BLM officials. We agreed that there is also a distribution problem in this allotment. If a spring or reservoir were developed in Tincup Creek, this distribution problem would be largely alleviated. Again, the time frame for such an improvement would depend on the results of our proposed monitoring, our funding limitations, and the priority assigned the proposed improvement in relation to other improvements proposed in the EIS area. Carrying capacity adjustments, if needed, would be determined after completion of the monitoring studies.

9-3 If you will provide us with the discrepancies shown on our maps, we will correct them as soon as possible.

9-4 We cannot further clarify grazing treatment proposals for these two allotments because treatment will depend on those factors previously mentioned: monitoring results, funding and priority.

10

Carbon County
Stock Growers Association

July 4, 1983

District Manager
Bureau of Land Management
Rawlins District Office
P.O. Box 670
Rawlins, Wyoming 82301

Dear Sir:

On behalf of Carbon County Stock Growers Association, I want to thank BLM personnel for the opportunity to review the Draft Elk Mountain Environmental Impact Statement. It has been both an educational experience and a pleasure working with your EIS team over the last two years. In general, this document is the most practical and objective draft EIS I have yet read on the subject of livestock grazing. Your staff is to be commended. Following are some specific comments and questions concerning the contents of the draft. Hopefully, our interaction will result in the final EIS. Treatment of these subjects will strengthen the quality of the final document in the development of the Rangeland Program Summary.

The NEPA mandate for a balance between alternatives must be maintained. Consequently, I continue to know that management for soil and watershed, wildlife and livestock will be the "Enhanced Watershed/Wildlife and Soil Resources" alternative and in the "Enhanced Livestock" alternative. The standard operating procedures, multiple use regulations and the law provide for this balanced treatment. The only real difference between these two alternatives is the workable treatment of livestock and wildlife

10-1 forage. Because of the potential adverse impacts to private and state lands, enhancement of such should be treated in separate alternatives, but neither should be enhanced at the expense of soil stability or the productive components of the rangeland ecosystem. Would you amend the enhanced livestock alternative to establish a greater balance in the treatment of livestock and wildlife forage? Livestock are presently impacted the most by allowing watershed and soil resources from the silent. The premise BLM misconception seems to be that watershed and soils will deteriorate if livestock are enhanced but not if wildlife are enhanced. This is not true. Both wildlife and livestock require stable terrestrial habitats, and both are adversely choked the environment if not properly managed.

Throughout the document, livestock are treated only as an economic resource. Wildlife are treated both as an economic resource and as a

10-2 biological resource with recognized physical and behavioral adaptive responses to environmental conditions and management. Livestock also

Page 2

exhibit biological and ethological traits that should be addressed in a grazing EIS. Refereed treatment of livestock as a biological resource requires a greater expertise in animal science and ethology than range specialists an EIS team normally can demonstrate. An academic curriculum in Range Science does not provide the training in animal science and ethology to be considered professional. Livestock are not plants. Professionals must demonstrate professional knowledge of their field communicate with this discipline by wildlife biologists should be placed on the same EIS team. EIS preparation should not commence until this balance is achieved. Only then can BLM evaluate the various alternatives in the draft EIS. Only then can BLM evaluate the various alternatives in the draft EIS. Only then can BLM evaluate the various alternatives will impact vary on the population

10-2 affected environments. Only then will impacts vary on the population affected environments. Only then can livestock species if the enhanced wildlife alternative is chosen as the preferred alternative? Will impacts be the same on single perturbation areas as on steep breaking grounds or crucial livestock winter range? Will impacts be the same if the livestock are in pure bred herd or a cross bred herd? Do you agree that livestock and wildlife biology is the most important discipline required in grazing EIS on is wildlife biology? If so, would you restructure EIS teams to include individuals more knowledgeable in livestock biology and behavior? Also, would you incorporate more information on livestock biology and behavior on affected resources in the final EIS?

Why is private land not treated as a resource in the affected environment section of the draft EIS? Since a significant percentage of the rangeland in the Divide Resource Area is privately owned and the ownership pattern is complex, it is impossible for the BLM to evaluate a proposed action or any alternative without a full knowledge of impacts on private land. The effects of the Proposed Action and each alternative upon private land must be evaluated in this document to achieve any level of objectivity or

10-3 balance. For example, what may happen on private land in the checkerboard if BLM chose to enhance wildlife on intermingled public sections? Such a decision could result in an increase in wildlife numbers that would impacts on adjacent private lands and subsequent increases in damage claims and depredation problems and obligations. It seems that BLM assumes that neither the proposed action nor any alternative will include land in the EIS area. Is this true?

I strongly recommend that BLM work with the BLM Grazing Advisory Boards and the Carbon County Grazing Board to develop a more formal approach to

10-4 rancher consultation with prescribed flexibility at the district level to maximize successful implementation. Such an approach will help ensure greater cooperation in land management decisions and ultimately a greater quantification of range improvements and other enrichment criteria to accurate evaluate the benefits of the EIS. Many of these summary statistics are in error because a more centralized approach to rancher consultation was not initiated. The Appendixes are a good example. These data have not been verified with each rancher. Also, private land information has not been verified with each rancher. Also, private land information has not been verified with each rancher. Also, private land information has the level of private land ownership and improvements. Funding is not adequate to further consultation also would preclude a website to discuss mutual concerns regarding big game populations.

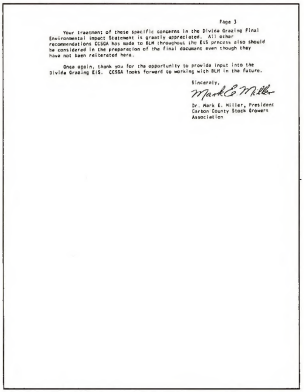
RESPONSES TO LETTER NO. 10

10-1 BLM does not assume that enhanced livestock management would result in deteriorating soil and watershed. As stated in the text (page 23, Enhanced Livestock Grazing Alternative), other resources would be protected by standard operating procedures and multiple-use and/or legal constraints.

Under the Enhanced Livestock Alternative, forage production would be accelerated and livestock numbers would be expected to increase.

Under the Enhance Watershed, Wildlife, and Soil Resources Alternative, as stated on page 85 of the Wildlife section, wildlife (big game animals) would not be expected to increase. The population objectives established by the Wyoming Game and Fish Department are considered to be below the wildlife grazing capacity. However, because of the potential adverse impacts to private and state lands within a herd unit, the population objectives would be maintained since they would be based on user and landowner concerns as well as the overall grazing capacity. As a result, there would be no population increases above the big game herd unit objectives. Except in specific (as yet undefined) areas, under this alternative livestock numbers would not be changed.

10-2 Because the DEIS is not allotment specific in its analysis, the questions asked in the latter part of the paragraph can best be answered after allotments have been formulated. Problems such as calving areas and locations of water developments will be resolved in close coordination with the permittees. Although animal science specialists can be consulted during consultation, we believe most ranchers would prefer that these problems be resolved between themselves and BLM officials. As previously stated, the Enhance Watershed, Wildlife, and Soil Resources Alternative would not automatically lead to increased wildlife numbers. We believe that we have addressed livestock biology and behavior on pages 61 and 62 of the DEIS to the extent warranted by the impacts.



Page 3

Your treatment of these specific concerns in the Divide Grazing Final Environmental Impact Statement is greatly appreciated. All other recommendations CCSGA has made to BLM throughout the EIS process also should be considered in the preparation of the final document even though they have not been reiterated here.

Once again, thank you for the opportunity to provide input into the Divide Grazing EIS. CCSGA looks forward to working with BLM in the future.

Sincerely,

Dr. Mark G. Miller, President
Carbon County Stock Growers Association

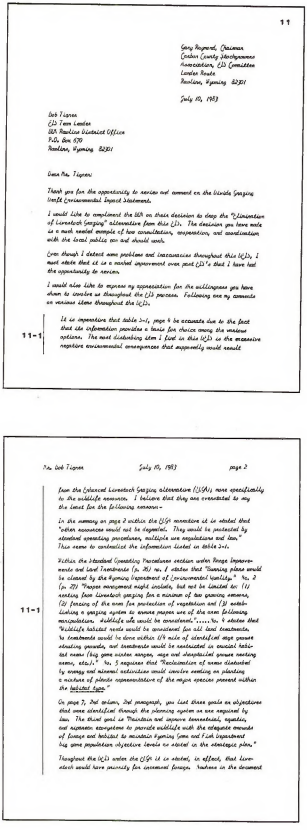
10-3 Private land has not been treated as a separate resource because we assumed that actions taken by BLM on public land would have the same or very similar effects on unfenced adjacent private lands.

Furthermore, BLM assumed that the livestock operators in the EIS area were long-term, profit-oriented persons, and therefore would not overgraze their private land except for short-term, emergency situations. Fenced private lands could be affected differently. As stated in the Proposed Action, management decisions would be based on all available data, including that gathered by monitoring and consultation with the operators. Any effects on private lands would depend on the management decisions and the landowner's reaction to those decisions. Therefore, at this time it is not possible to analyze the effects on fenced private lands in the Divide EIS area. However, private land was considered in the Economic section of the DEIS. BLM does not assume that the Proposed Action or the alternatives will have no effect on private land in the EIS area.

10-4 BLM did work with the Grazing Advisory Boards, Wyoming State Grazing Advisory Board, and the local ranchers during the consultation process for this EIS. We believe that for a newly established policy, the process is working well. When allotment-specific plans are formulated, the permittees will be given ample opportunity to present their needs and voice their opinions and concerns. These inputs will be fully considered.

Our experience with the consultation process indicates that most ranchers prefer an on-the-ground consultation with a BLM range conservationist rather than a formal consultation involving other people.

The summary statistics presented in the DEIS are constantly changing. The statistics used represent our most current information at the time the DEIS was written. BLM is continually updating these statistics in coordination with the operators.



11

Gary Haycraft, Chairman
Crook County Stockgrowers
Association, LD Committee
Linder Route
Moorcroft, Wyoming 82721

July 15, 1983

Bob Tigner
LD Team Leader
BLM Moorcroft District Office
P.O. Box 670
Moorcroft, Wyoming 82721

Dear Mr. Tigner:

Thank you for the opportunity to review and comment on the Nicolia Grazing Unit Environmental Impact Statement.

I would like to compliment the BLM on their decision to drop the "Elimination of Livestock Grazing" alternative from this LD's. The decision you have made is a much needed example of how consultation, cooperation, and coordination with the local public can and should work.

Even though I detect some problems and inaccuracies throughout this LD's, I must state that it is a marked improvement over past LD's that I have had the opportunity to review.

I would also like to express my appreciation for the willingness you have shown to involve us throughout the LD's process. Following are my comments on various items throughout the LD's:

11-1 It is my impression that table 3-1, page 9 be accurate due to the fact that the information provides a basis for choice among the various options. The most disturbing item I find in this LD's is the excessive negative environmental consequences that supposedly would result

Mr. Bob Tigner July 15, 1983 page 2

from the Enforced Livestock Grazing alternative (ELGA), more specifically in the wildlife environment. I believe that they are overstated in my the least for the following reasons -

In the summary on page 3 within the ELGA discussion it is stated that "other resources would not be degraded. They would be protected by standard operating procedures, multiple use regulations and law." This seems to contradict the information listed in table 3-1.

Within the standard Operating Procedures section under Range Improvements and Land Treatments (p. 26) no. 1 states that "Fencing plans would be cleared by the Wyoming Department of Environmental Quality." No. 2 (p. 27) "Proper management might include, but not be limited to: (1) resting from livestock grazing for a minimum of two growing seasons, (2) fencing of the area for protection of vegetation and (3) establishing a grazing system to ensure proper use of the area following manipulation. Wildlife use would be considered." ..... No. 4 states that "Wildlife related needs would be considered for all land treatments. No treatments would be done within 1/4 mile of identified sage grouse breeding grounds, and treatments would be restricted in crucial habitat areas (key pre-winter ranges, sage and shrub-related grouse nesting areas, etc.)." No. 5 requires that "Reclamation of areas disturbed by energy and mineral activities would involve seeding or planting a mixture of plants representative of the major species present within the habitat type."

11-1

On page 7, 3rd column, 3rd paragraph, you list three goals as objectives that were identified through the planning system we are required by law. The third goal is "Maintain and improve environmental quality, and supports ecosystems to provide wildlife with the adequate amounts of forage and habitat to maintain hunting game and fish populations at some population objective levels as stated in the strategic plan."

Throughout the ELGA when the ELGA is stated, in effect, that livestock would have priority for increased forage. Nowhere in the document

RESPONSES TO LETTER NO. 11

11-1 Measures would be designed to make more forage available to livestock. These measures would be identified as a result of monitoring, any other additional data, and consultation. These measures could either make existing forage more useable to livestock or, if additional forage were created by these measures, it would be made available to livestock. On page 23, we state that if wildlife population objectives could not be met in an area, reduction in the wildlife herd unit objectives would be recommended to the Wyoming Game and Fish Department. These specific areas would be identified through monitoring data, any other data and consultation. On page 28 of the DEIS, we state that for the purposes of this analysis it is assumed that wildlife "...maximum population levels would remain as they are in the WGFD's Strategic Plan (Draft 81)."

Table S-1 has been revised to reflect the impacts of this alternative.

11-2 The biological effects of livestock grazing as well as the socioeconomic and operational effects were analyzed in the DEIS. The economic rather than the biological aspects were presented in Table S-1 because we look at livestock as an industry, not as a public resource.

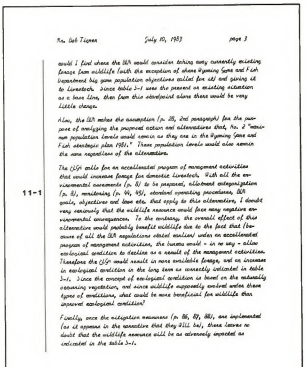
11-3 Please see letter No. 10, response 3.

11-4 The third standard operating procedure on page 27 in the DEIS concerning land treatments has been modified to read as follows:

> 3. To prevent erosion, land treatments would be analysed on a case-by-case basis to determine the maximum percent of slope on which the treatment could be completed. Bureau guidelines, safety, and specific site characteristics will be primary considerations.

11-5 The information in Appendix 2 concerning the Ferris Mountains allotment (0207) has been changed to read as follows:

Allotment Number	Allotment Name	Interior	Exterior	Reservoirs/ Pits	Wells/ Pumps	Springs	Pipelines	Troughs
0201	Buzzard	39	47	4	10	0	2	0
0202	Buzzard Ranch Meadows	NA	NA	0	0	0	0	0
0203	Cherry Creek	23	14	1	0	0	0	0
0204	Desert Claim	1	5	0	0	0	0	0
0205	Devil's Gate	27	30	8	6	10	0	0
0207	Ferris Mountain	27	31	1	0	0	0	0
0209	Junk Creek	8	19	1	0	1	1	0
0212	Long Creek	15	18	2	0	3	0	0
0215	Pole Canyon	0	9	0	0	3	0	0



Rm. Utah Trapper July 10, 1983 page 3

would I find where the BLM would consider taking any currently existing forage from wildlife (with the exception of above Wyoming type and Fish impairment big game population objectives called for all and giving it to livestock. Since table 2-1 were the present on existing situation as a base line, then from this standpoint there would be very little change.

Also, the EIS makes the assumption (p. 31, 2nd paragraph) for the purpose of analyzing the proposed action and alternatives that, No. 2 "minimum population levels would remain as they are in the Wyoming Game and Fish strategic plan 1981." Those population levels would also remain the same regardless of the alternatives.

11-1 The EIS calls for an accelerated program of management activities that would increase forage for domestic livestock. With all the environmental easements (p. 6) to be imposed, allotment categorization (p. 8), monitoring (p. 44, 45), allotment operating procedures, AUM goals, objectives and term etc. that apply to this alternative, I doubt very seriously that the wildlife resource would face many negative environmental consequences. To the contrary, the overall effect of this alternative would probably benefit wildlife due to the fact that because of all the BLM regulations stated earlier, under an accelerated program of management activities, the trauma would - in no way - allow ecological evolution to decline as a result of the management activities. Therefore the EIS would result in more available forage, not an increase in ecological evolution in the long term as incorrectly indicated in table 2-1. Since the concept of ecological evolution is based on the naturally occurring vegetation, and since wildlife supposedly evolved under these types of conditions, what would be more beneficial for wildlife than improved ecological evolution?

Finally, once the mitigation measures (p. 86, 87, 88), are implemented (as it appears in the narrative that they will be), there leaves no doubt that the wildlife resource will be as adversely impacted as indicated in the table 2-1.

11-6 The information presented in Appendix 2 represents the best information BLM had during preparation of the DEIS. During implementation of BLM's final rangeland improvement policy in 1983 and 1984, which will include permittee/lessee consultation, the information in Appendix 2 will be updated as necessary to accurately reflect the current range improvement situation.

For these various reasons, combined with the fact that the bureau lacks the authority to regulate wildlife matters, I cannot agree with the bureau's conclusion.

11-1 Based on the information currently present within the EIS I would encourage the BLM to reassess this alternative and make the necessary changes that it would take to provide the decision maker a more accurate picture of the long term environmental consequences of the Enhanced Livestock Grazing Alternative.

The information in table 2-1 under the to Action Alternatives gives the reader the impression that the majority of rangeland in the EIS area is declining in trend. This, as yet, has not been shown and is only speculation. The BLM should wait until monitoring results are completed before making these kinds of judgements. I believe this is one of the reasons why we have a monitoring program.

11-2 In regard to the items listed under "Revenue" in table 2-1, why was livestock not also included as a revenue? I would assert that the impacts to the economic vals of livestock are relevant fairly well in this table, but livestock should also be considered in the same context as wildlife, recreation, etc. Wildlife was analyzed economically as well as biologically, therefore it would only be consistent that livestock also be considered in the context of a biological resource. I believe this information would add to the decisionmakers ability to choose among the various options.

11-3 I find it difficult to understand how the bureau can adequately analyze the effects of various management alternatives without considering more thoroughly the impacts that these actions will have upon intermingled nonfederal lands. This land (8% of the EIS area) is an affected resource and should be treated as such. Why has this not

11-3 been done?) and will the BLM consider doing it in future EIS's?

Some of the management actions analyzed in this EIS would have significant impacts upon these private and state lands. A few of the more important actions that need to be analyzed in this EIS, that affect these lands are: adjustments in seasonal dates and season of use, the implementation of grazing systems, cross-fence control of predators when the Enhanced Alternative, Wildlife, and Wild Horse/Burro alternatives, and deferred grazing as defined in the glossary.

11-4 On page 27, No. 3 under Land Tenements in the Standard Operating Procedures section, it is stated that "land easements would not be done on slopes greater than 15 percent." Is this BLM policy? and if not, where did it originate? If indeed it is policy, then it needs to be changed. I would encourage the BLM to delete it from this EIS and all subsequent EIS's due to the fact that it is unrealistic and places too much restriction on land treatments. Land treatments should be reviewed site by site and based on their individual merit. This should also be done at the basic land through consultation with the affected parties.

11-5 On page 120 in appendix 2, the information listed for allotment 0321, Fannie Brownlee, is incorrect. We have, only one reservoir/pit on BLM land, no waterhole/wallow/pump, no "improved" springs, no pipelines and one new trough that we get, have not have a signed cooperative agreement.

11-6 If this type of error is not uncommon throughout the appendices, then perhaps the BLM should point this out in the form of an amendment to the appendix or as a footnote.

In closing, I would like to say that rangeland is critical to our national health due to the fact that it is a very important part of

Mr. Bob Tagart July 10, 1983 page 6

our nation's ability to produce food. The livestock that inhabit our ranges are as good and as cheap a source of food as has any other nation in the world, therefore we have got to keep it viable.

There is a need for national measures that manipulate produce food and that are perceived are in the human welfare. EIS's accentuate a manner by which people are informed about our nation's rangelands. Therefore, we must analyze all alternatives within these EIS's that are productive and well balanced.

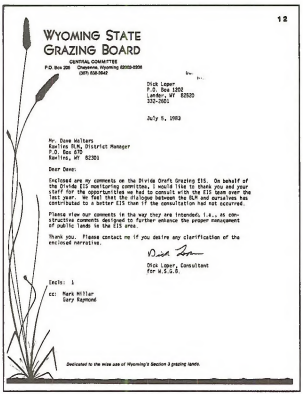
The Enhanced Livestock Grazing alternative as analyzed in this EIS - I feel - is a good alternative but I think it could have been a much better alternative had the human resource and watershed values as a part of it. Afterall, soil and watershed values are basic to the health of the livestock industry. Perhaps this alternative should have been - and possibly can be in future EIS's - analyzed as the Enhanced Livestock, Watershed and Soils Resources Alternative.

Wildlife are also very important as they contribute to the good quality of life we enjoy in America among other beneficial things. I do think it is possible to find an acceptable balance between livestock and wildlife within this alternative. This balance is a very difficult thing to determine and should be based on scientific research and the welfare of the nation. We must consider it a challenge to learn how to manage the range resource properly for both livestock and wildlife.

Sincerely,

Doug Hayward

Doug Hayward
Fannie Mountain Ranch
Linden Route
Meeteetse, Wyoming 82431



12

WYOMING STATE
GRAZING BOARD

CENTRAL COMMITTEE
P.O. Box 328 Cheyenne, Wyoming 82003-0328
(307) 856-0940

Dick Logan
P.O. Box 1202
Lander, WY 82520
332-3951

July 9, 1993

Mr. Dave Walters
Rawlins M.D. District Manager
P.O. Box 670
Rawlins, WY 82301

Dear Dave:

Enclosed are my comments on the Divide Draft Grazing EIS. On behalf of the Divide EIS monitoring committee, I would like to thank you and your staff for the opportunity to participate in consultation with the team over the last year. We feel that the dialogue between the BLM and ourselves has contributed to a better EIS than if the consultation had not occurred.

Please view our comments in the way they are intended, i.e., as constructive comments designed to further enhance the proper management of public lands in the EIS area.

Thank you. Please contact me if you desire any clarification of the enclosed narrative.

Dick Logan, Consultant
for W.S.G.B.

Encls: 1

cc: Mark Miller
Gary Raymond

Dedicated to the wise use of Wyoming's Section 3 grazing lands.

COMMENTS ON THE
DIVIDE
DRAFT GRAZING EIS

In general, it is my opinion that the Divide Draft Grazing EIS complies with the intent of the N.E.P.A., the C.E.Q. regulations pertaining to the EIS's, and current BLM policy on the preparation of Grazing EIS's. The document is structured in an orderly way and the narrative is usually clear as to the point being made. The following are comments on specific parts of the Draft.

Summary

12-1 Page 1 - This section would be better understood if the reader knew how many public comments were received on each of the items shown as having been discussed during the scoping process. Instead of listing them in the order they were received, they should be listed in the order of most importance with respect to public comment and controversy.

12-2 Page 2 - The narrative under the Enhance Livestock Heading is not as well balanced with respect to a discussion of multiple use considerations as in the other alternative narratives. This lack of balance sets the stage for some readers to presume that the Enhance Livestock alternative would not protect other basic resource values as well as another alternative might. This is not the case because BLM is required by law to protect basic soil and watershed values regardless of the priority grazing use, and in fact, proper livestock grazing is not detrimental to other multiple use values.

12-3 Since categorization is nothing more than an assessment of the present situation, I do not understand the reason why allotments were not categorized in the No Action alternative. Please explain the rationale for this.

12-4 Page 3 - Since the list of management actions which could be taken on I category lands is much larger than a) use adjustments, b) range improvements, and c) grazing treatments, the table on this page should not pick out just these three items to show starting dates for

RESPONSES TO LETTER NO. 12

12-1 The importance of an issue or the amount of controversy concerning an issue cannot always be measured in terms of the number of responses received concerning that issue. Therefore, it would be inappropriate for us to list issues "...in the order of most importance with respect to public comment and controversy."

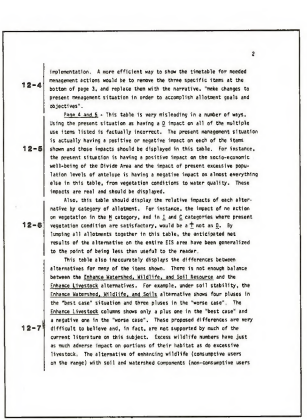
12-2 We have attempted to make it clear to the reader that the Enhanced Livestock Grazing Alternative would protect the other basic resources by stating on page 23: "Other resources would not be degraded. They would be protected by standard operating procedures, multiple-use regulations and law."

12-3 The No Action Alternative is a continuation of existing management. Since the allotments had not been categorized under prior management, that process was not considered applicable to the No Action Alternative.

12-4 We agree that the range of possible management actions includes more than the three we listed. We think that these three management actions are representative of the type of changes that we might make in order to achieve management objectives. Although the suggested terminology of "make changes to present management situation in order to accomplish allotment goals and objectives" acurately summarizes the situation, we do not believe that making the suggested change would clarify the EIS.

12-5 The "present situation" column reflects the current or baseline situation, and is provided here as a basis for comparing the impacts of the Proposed Action or various alternatives. The present situation is presented in the Affected Environment section. The impacts of the No Action Alternative (or continued present management) are shown in the last column of Table S-1.

12-6 It is correct that the impacts would vary by category of allotment: Table S-1 is an overall summary of environmental consequences. Environmental consequences by category of allotment are presented in the Environmental Consequences section.



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implementation. A more efficient way to show the timetable for needed management actions would be to remove the three specific items at the bottom of page 3, and replace them with the narrative, "Make changes to present management situation in order to accomplish allotment goals and objectives".

12-4

Page 4 and 5 - This table is very misleading in a number of ways. Using the present situation as having a 0 impact on all of the multiple use items listed is factually incorrect. The present management situation is actually having a positive or negative impact on each of the items shown and those impacts should be displayed in this table. For instance, the present situation is having a positive impact on the socio-economic well-being of the Divide Area and the impact of present excessive population levels of antelope is having a negative impact on almost everything else in this table, from vegetation conditions to water quality. Those impacts are real and should be displayed.

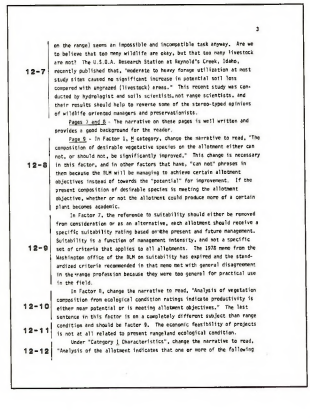
12-5

Also, this table should display the relative impacts of each alternative by category of allotment. For instance, the impact of no action on vegetation in the M category, and in I and C categories where present vegetation condition are satisfactory, would be + to not as C. By lumping all allotments together in this table, the anticipated net results of the alternative on the entire EIS area have been generalized to the point of being less than useful to the reader.

12-6

This table also inaccurately displays the differences between alternatives for many of the items shown. There is not enough balance between the Enhance Watershed, Wildlife, and Soil Resource and the Enhance Livestock alternatives. For example, under soil stability, the Enhance Watershed, Wildlife, and Soils alternative shows four pluses in the "best case" situation and three pluses in the "worse case". The Enhance Livestock column shows only a plus one in the "best case" and a negative one in the "worse case". These proposed differences are very difficult to believe and, in fact, are not supported by much of the current literature on this subject. Excess wildlife numbers have just as much adverse impact on portions of their habitat as do excessive livestock. The alternative of enhancing wildlife (consumptive users on the range) with soil and watershed components (non-consumptive users

12-7



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on the range) seems an impossible and incompatible task anyway. Are we to believe that too many wildlife are okay, but that too many livestock are not? The U.S.D.A. Research Station at Reynolds Creek, Idaho, recently published that, "moderate to heavy forage utilization at most study sites caused no significant increase in potential soil loss compared with ungrazed (livestock) areas." This recent study was conducted by hydrologists and soils scientists,not range scientists, and their results should help to reverse some of the storm-toped opinions of wildlife oriented managers and preservationists.

12-7

Pages 1 and 2 - The narrative on these pages is well written and provides a good background for the reader.

Page 5 - In Factor 1, M category, change the narrative to read, "The composition of desirable vegetative species on the allotment either can not, or should not, be significantly improved." This change is necessary in this factor, and in other factors that have, "can not" phrases in them because the BLM will be remissing to achieve certain allotment objectives instead of towards the "potential" for improvement. If the present composition of desirable species is meeting the allotment objective, whether or not the allotment could produce more of a certain plant becomes academic.

12-8

In Factor 2, the reference to suitability should either be removed from consideration or as an alternative, each allotment should receive a specific suitability rating based on the present and future management. Suitability is a function of management intensity, and not a specific set of criteria that applies to all allotments. The 1978 memo from the Washington office of the BLM on suitability has expired and the standardized criteria recommended in that memo met with general disagreement in the range profession because they were too general for practical use in the field.

12-9

In Factor 8, change the narrative to read, "Analysis of vegetation composition from ecological condition ratings indicate productivity is either near potential or is meeting allotment objectives." The last sentence in this factor is on a completely different subject than range condition and should be factor 9. The economic feasibility of projects is not at all related to present rangeland ecological condition.

12-10

Under "Category I Characteristics", change the narrative to read, "Analysis of the allotment indicates that one or more of the following

12-11

12-12

12-7 The example given makes the assumption that wildlife numbers would increase under the Enhance Watershed, Wildlife, and Soils Alternative, which is not correct. Habitat conditions and condition of game animals would improve. As stated on page 28, BLM specialists assume that wildlife numbers would remain constant under this alternative. The text has been altered to reflect this assumption on page 2 of the DEIS.

12-8 The phrase "...be **significantly** improved." (emphasis added) must be noted when considering this and other factors with the same terminology. If the present composition of desirable species within an allotment could be significantly improved, the BLM would manage with the goal of improving this compositon.

12-9 We believe that suitability must be applied on an EIS area basis at this time. After monitoring is completed, we will be able to give each allotment a specific suitability rating. Under the Bureau's Final Grazing Management Policy (W.O. Instruction Memorandum 82-292) suitability is still one of the consideration in allotment analysis.

12-10 If the analysis of vegetation composition from ecological condition ratings indicates productivity is not at or near potential, the BLM would manage with the goal of improving this condition.

12-11 The economic feasibility of range projects is directly related to present rangeland ecological condition.

In order to determine if proposed range improvement projects would be cost effective, the present range condition must be closely analyzed to determine the potential for increases in forage yield from the proposed project. Without an expected economic return greater than the investment, it would not be feasible and prudent to make this proposed investment.

One of the reference sources substantiating this is the University of Wyoming publication entitled "An Economic Evaluation of Range Resource Improvement" (Olson, Daley, and McAfee 1977). In several instances throughout the document, the

factors exist and that allotment goals and objectives are presently not being met." This change is necessary to show the reader that achieving allotment goals and objectives is of major concern to the Bureau and affected parties.

12-12 Previous comments on the issues of "can not and should not" or "can and should", and allotment objectives apply to 3 factors too.

Page 10 - The EIS does not provide enough information on how allotments were ranked within categories. The Bureau should develop a set of subjective and objective criteria for this ranking process, and show how each allotment ranked according to that set of criteria. The EIS should also state when actual data was used in the ranking, or when opinion and/or speculation was used to evaluate the allotment. The reader should be able to follow the Bureau's reasoning during these very critical processes. After all, the assessments of whether an allotment is M, I or C and then whether or not it is high or low priority, will be a major commitment of public money and man-power to certain allotments. Affected interests should be able to clearly see how those commitments were made.

12-13 Page 11 through 14 - Does the BLM have, in each allotment file, a record of the data, opinions, etc., used to arrive at the statements of which factors apply to each allotment in Table 1-2? Do these records contain the magnitude of the "problem" for each factor in each allotment?

12-14 Page 18 - This EIS should outline and document the consultation process used to arrive at the rankings in Tables 1-3 through 1-6.

This EIS should more clearly describe what is meant by "less intensive/more intensive" monitoring, by category, and project the impacts on the BLM of the intended monitoring program, for each alternative. In general, each alternative would require a different work-load of BLM money and man-power and the EIS should state what the impact of each alternative would be on the Rawlins BLM office.

12-15 Page 24 - The introductory sentence in Factor 2 should be included in the introduction to Management Actions for Category I Allotments because consultation with affected parties should occur in every factor.

12-16 In the paragraph above Factor 3 on page 30, the narrative seems to suggest that grazing systems and adjustments in use levels are the

solutions if management objectives are not now being met. This attitude fails to recognize that management objectives cover lots more than use levels and that a number of possible solutions to unsatisfactory situations are available for use in rangeland management. This narrative should more appropriately state that the Bureau will, 1) identify the problem(s), 2) consider the management alternatives which would solve the problem(s), and 3) pick the one(s) that will most efficiently and economically solve the problem(s). There is still too much emphasis on suggesting that intensive systems and use level adjustments are the probable solutions prior to the time when we have evaluated both the problem(s) and the practical solutions. Intensive grazing systems and cuts in numbers are not a panacea for managing rangelands.

12-17 Page 30 - Factor 5 talks of "grazing animals" but the narrative below the factor speaks only of livestock exclusions on crucial wildlife areas. The two paragraphs seem out of balance.

12-18 Factor 8 - The narrative on range readiness is too general and the definition of this term in the Glossary is not consistent with current range texts on this subject.

12-19 Page 31 - Since adjacent private and state lands are part of the affected environment of the EIS area, does the BLM intend to evaluate the environmental impact of possible changes in public land seasons of use on private and state lands affected by such a BLM action?

12-20 Page 32 - Changing forage locations to consolidate I category lands is a very bad idea. The impact on existing multiple uses could be significant should this occur on any large scale.

The EIS narrative mentions steps that AMP's will be developed under a wide variety of situations and alternatives. But the 1984 Bureau budget contains no funds for new AMP's and the trend seems to be towards cooperatively developed plans instead of traditional AMP's. Perhaps the EIS should usually refer to cooperative management plans instead of AMP's?

12-21 Page 25 - The narrative on the use of the page under Livestock Industry is much too short considering the importance of this industry to public land management in the EIS area.

Under Monitoring, BLM manual Section 4430.5b, the permanent 3P1M Transect method, should not be the general guide for developing trend

relationship of the economic feasibility of range projects to present ecological condition is stressed. In the introduction, the authors state, "The ability of western livestock ranchers to produce the feeder animals necessary....is limited by the inherent ecological capability of the rangeland resource." They again state on page 4, "How much a given range site can be improved toward producing the potential natural plant community is determined by the present condition class." In concluding, the authors found that "As the conditon of the rangeland is improved, the quantity of forage available for harvest is increased; hence, the economic returns from range resources increase."

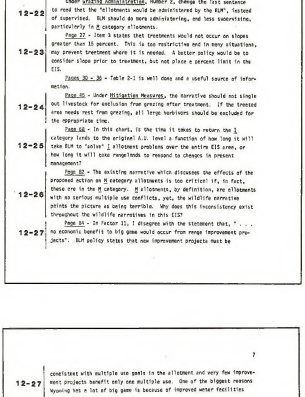
12-12 We cannot adopt this suggestion because we have not developed allotment specific goals and objectives at this time. These goals will be developed in consultation with operators. The monitoring program will then be developed to evaluate progress toward meeting these goals.

12-13 The allotments were ranked within categories by applying professional judgment to the information available to the bureau. This information included operator input concerning of range and soil conditions; distribution patterns of livestock, wild horses and wildlife; public concern; and existing resource conflicts.

The ranking of the allotments within the categories is a dynamic process and is subject to change when additional data from monitoring or other sources is available.

12-14 BLM has a narrative of the consultations between each livestock permittee/lessee and BLM concerning the categorization of each allotment. The narrative discussed the "problems" associated with each allotment and the category in which each allotment was placed. This information is available for review in the Rawlins District office.

12-15 The allotments in Tables 1-3 through 1-6 were categorized, based on the criteria factors and the permittee/lessee consultation process. Ranking of allotments by priority within the "I" category is relative to the magnitude and seriousness of the "problems" associated with that grouping. Numerical ranking of allotments for commitment of manpower and monies is a part of the decision process that follows the final EIS.



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monitoring procedures in Wyoming. A more efficient and practical guide would be to allow the field office to choose the trend procedure best suited to the situation(s) they find in each allotment, from those shown in the state of the art Monitoring Procedures Handbook developed by the Denver Service Center in 1982. The field should not be tied to one field procedure prior to assuring whether or not that field procedure is the best one to use.

12-21

Under Grazing Administration, change the last sentence to read that the "allotments would be administered by the BLM", instead of supervised. BLM should do more administering, and less supervising, particularly in M category allotments.

12-22

Page 27 - Item 3 states that treatments would not occur on slopes greater than 15 percent. This is too restrictive and in many situations, may prevent treatment where it is needed. A better policy would be to consider slope prior to treatment, but not place a percent limit in the EIS.

12-23

Pages 30 - 36 - Table 2-1 is well done and a useful source of information.

12-24

Page 40 - Under Historian Measures, the narrative should not single out livestock for exclusion from grazing after treatment. If the treated area needs rest from grazing, all large herbivores should be excluded for the appropriate time.

12-25

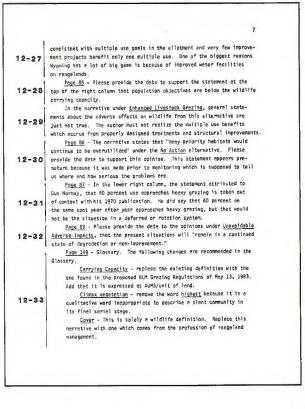
Page 44 - In this chart, in the time it takes to return the I category lands to the original A.U. level a function of how long it will take BLM to "solve" I allotment problems over the entire EIS area, or how long it will take rangelands to respond to changes in present management?

12-26

Page 62 - The narrative correction which discusses the effects of the proposed action on M category allotments is too critical of, in fact, these are in the M category. M allotments, by definition, are allotments with no serious multiple use conflicts, yet, the wildlife narrative paints the picture as being terrible. Why does this inconsistency exist throughout the wildlife narratives in this EIS?

12-27

Page 91 - In Factor II, I disagree with the statement that, " . . . no economic benefit to big game would occur from range improvement projects". BLM policy states that new improvement projects must be



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conditions with multiple use goals in the allotment and very few improvement projects benefit only one multiple use. One of the biggest reasons Wyoming has a lot of big game is because of improved water facilities on rangelands.

12-28

Page 95 - Please provide the data to support the statement at the top of the right column that population objectives are below the wildlife carrying capacity.

12-29

In the narrative under Enhanced Livestock Grazing, general statements about the adverse effects on wildlife from this alternative are just not true. The author must not realize the multiple use benefits which accrue from properly designed treatments and structural improvements.

12-30

Page 96 - The narrative states that "many priority habitats would continue to be overutilized" under the No Action alternative. Please provide the data to support this opinion. This statement appears premature because it was made prior to monitoring which is supposed to tell us where and how serious the problems are.

12-31

Page 97 - In the lower right column, the statement attributed to Don Morrow, that 60 percent use approaches heavy grazing is taken out of context with his 1970 publication. He did say that 60 percent on the same spot year after year approaches heavy grazing, but that would not be the situation in a deferred or rotation system.

12-32

Page 99 - Please provide the data to the opinions under Unavoidable Adverse Impacts, that the present situations will "result in a continued state of degradation or non-improvement."

12-33

Page 149 - Glossary. The following changes are recommended in the Glossary.

Carrying Capacity - replace the existing definition with the one found in the proposed BLM Grazing Regulations of May 13, 1983. Add that it is expressed as AUM's/unit of land.

Climax vegetation - remove the word highest because it is a qualitative word inappropriate to describe a plant community in its final sertal stage.

Cover - This is solely a wildlife definition. Replace this narrative with one which comes from the profession of rangeland management.

The monitoring program will vary by allotment, depending on the "problems" and consultation with the permittees/lessees and other affected interests. Therefore, a description of "less intensive/more intensive" is not possible at this stage of the process. The identification of the monitoring studies and the intensity of monitoring will occur after the final EIS. The consultation process will continue on an allotment basis.

12-16 Page 19 of the text has been changed to more accurately reflect that the bureau will consider all practicable actions to achieve management objectives.

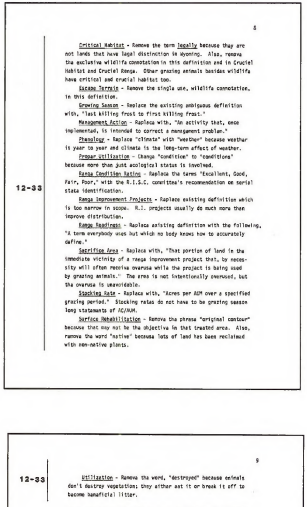
12-17 Livestock grazing exclusion has been observed to accomplish some management objectives without exclusion of big game. Additional studies are needed for comparative purposes regarding the exclusion of all grazing animals. However, at the present time excluding livestock is considered a practical management action. The majority of the improvement to a wetland, riparian area or meadow is derived when livestock are excluded. The term "some crucial wildlife areas" is misleading; therefore, the text has been changed on page 20.

12-18 The narrative discussing range readiness cannot be made allotment specific at this time because of the number of allotments in the EIS area, the precipitation zones, and the number of vegetative species involved in the data collection process. Allotment specific discussions of the collection of range readiness data will be discussed in the individual allotment monitoring plans, which will be developed through the consultation process.

12-19 The definition of "range readiness," was obtained from *A Glossary of Terms Used in Range Management*, which was published by the Society for Range Management.

Adjustments in turnout dates and/or seasons of use would result in similar environmental impacts to unfenced private and state lands as to public lands; see response to letter 10, response 3.

12-20 Before "C" Category allotments would be consolidated, by changing existing fences, specific proposals would be evaluated by a multiple-resource team. Consultations with affected operators and other involved parties would be conducted prior to



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Critical Habitat - Remove the term legally because they are not lands that have legal distinction in wyoming. Also, remove the exclusive wildlife connotation in this definition and in Crucial Habitat and Crucial Range. Other grazing animals besides wildlife have critical and crucial habitat too.

Escape Terrain - Remove the single use, wildlife connotation, in this definition.

Growing Season - Replace the existing ambiguous definition with, "last killing frost to first killing frost."

Management Factor - Replace with, "An activity that, once implemented, is intended to correct a management problem."

Phenology - Replace "climate" with "weather" because weather is year to year and climate is the long-term effect of weather.

Proper Utilization - Change "condition" to "conditions" because more than just ecological status is involved.

Range Condition Rating - Replace the terms "Excellent, Good, Fair, Poor," with the B.I.S.C. committee's recommendation on serial state identification.

Range Improvement Projects - Replace existing definition which is too narrow in scope. R.I. projects usually do much more than improve distribution.

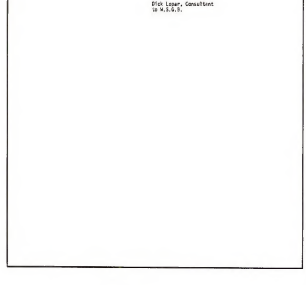
Range Readiness - Replace existing definition with the following, "A term everybody uses but which no body knows how to accurately define."

Sacrifice Area - Replace with, "That portion of land in the immediate vicinity of a range improvement project that, by necessity will often receive overuse while the project is being used by grazing animals." The area is not intentionally overused, but the overuse is unavoidable.

Stocking Rate - Replace with, "Acres per AUM over a specified grazing period." Stocking rates do not have to be grazing season long statements of AC/AUM.

Surface Rehabilitation - Remove the phrase "original contour" because that may not be the objective in that treated area. Also, remove the word "native" because lots of land has been reclaimed with non-native plants.

12-33



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Utilization - Remove the word, "destroyed" because animals don't destroy vegetation; they either eat it or break it off to become beneficial litter.

Thank you for the opportunity to comment on the Divide Draft EIS. Please contact me if I can clarify any of these comments.

Dick Logan

Dick Logan, Consultant
to W.S.G.D.

12-33

implementation. An environmental assessment would analyze the impacts of the proposed fence changes and any alternatives to each resource. Significant adverse impacts, which could not be mitigated, might be grounds to deny the proposed fencing adjustment.

References in the narrative to AMPs do not necessarily imply complex, expensive efforts. An AMP may consist of a simple document outlining a livestock grazing program that was developed in consultation, cooperation, and coordination with permittee(s), lessee(s), and/or other affected parties. Such an AMP will be completed prior to implementation of range improvements, livestock conversions, seasons of use adjustments, etc.

12-21 Livestock grazing is described in detail in the Affected Environment section of the DEIS. Information was not duplicated in an effort to avoid redundancy and provide a concise EIS.

BLM Manual 4430.56 discusses 10 different methods available for collecting trend information—not just one, as suggested by the comment. Several methods are included, because no one method is suitable for all situations. We will be coordinating with some universities to identify method(s) they would endorse.

12-22 It is the Bureau's responsibility on all allotments (including those in the "M" and "C" allotments) to conduct on the ground inspections, which we call "use supervision," to ensure compliance with the grazing regulations and the terms and conditions of the grazing permit.

12-23 We agree with this comment, and page 27 of the text has been changed to reflect this.

12-24 Livestock deferment from treated areas has been observed to accomplish management objectives (protecting the investment in treatment) without exclusion of wildlife.

12-25 See letter No. 13, response 4.

12-26 The section of wildlife narrative referred to states, "In general, the category "M" allotments contain good stands of diverse vegetation, which provide the structural diversity needed to support abundant

wildlife communities." This section further addressed wetlands or other key habitats that have multiple-use conflicts. Since these areas usually represent less than 1 percent of the allotments, the overall condition of these allotments did not justify placing the "M" in the "I" category.

12-27 Wyoming Game and Fish population objectives have been established through a consultation process involving private landowners, land management agencies and public input. These population objectives are not likely to increase from improvements on public lands. Although a change in distributions of big game might occur as a result of range improvements, an increase in objective numbers would not beexpected. Without an increase in number of licenses sold, there is no economic benefit.

12-28 This statement is based on several factors:

1. Range condition on most of the crucial winter ranges was in good condition, for example (all BLM acres):

Range Condition	Percentage of Allotment	Allotment Number
Baggs Pronghorn - along Muddy Creek		
Good and Excellent	73%	443, 530, & 612
Fair	9%	
Baggs Pronghorn - Red Rim		
Good and Excellent	81%	605
Fair	6%	
South Ferris		
Good and Excellent	67%	0218
Fair	32%	
Baggs Elk - Cow Butte - Deep Gulch		
Good and Excellent	61%	457 & 412
Fair	17%	412
Baggs Elk - Little Horse Mountain		
Good and Excellent	53%	1128, 1116, 1132, & 1109
Fair	42%	

If big game populations were above grazing capacities, we do not believe the range condition on the upland sites would be as good as it is.

2. Recent doe/fawn productivity is good, ranging from 62 to 87 percent in the pronghorn populations. If the big game populations were at carrying capacities, then productivity would indicate this through lower doe/fawn ratios, low yearling/adult ratios, poor animal condition, or density-dependent mortality. Overall, these trends have not been observed, even at high (peak) population levels. Therefore, populations are not believed to be above carrying capacity.

12-29 Under the Enhanced Livestock Grazing (ELG) Alternative, both beneficial and adverse impacts are presented. Adverse impacts have been occurring in the EIS area because of livestock grazing. Multiple-use benefits are presented in the DEIS.

12-30 Inventory and premonitoring data documenting overutilization and poor habitat condition of many areas are contained within the district's range, wildlife, and fishery files. Significant problems in some of these priority habitats have been adequately documented to justify immediate management actions. However, other areas are not adequately documented and these areas will be the subject of monitoring studies.

12-31 The reference to Hormay's statement that 60 percent utilization approaches heavy grazing did not imply that this would be the situation under a deferred or rotation system. The paragraph refers to the utilization rates that do or do not cause significant habitat alteration.

12-32 We agree, page 89 of the text has been changed in response to this comment.

12-33 Carrying Capacity: The term "carrying capacity" is not defined in the proposed BLM grazing regulations of May 13, 1983. The definition of " carring capacity" used in the DEIS is from *A Glossary of Terms in Range Management.*

Climax Vegetation: The term "Climax Vegetation" is as defined in *A Glossary of Terms in Range Management,* which is published by the Society for Range Management.

Critical Habitat: Page 150 of the text has been changed to read, "Formally designated habitat that is essential to the survival of populations of an endangered or threatened species of wildlife. We did not remove the exclusive wildlife connotation because "critical habitat and crucial range" are terms that have specific technical meanings in the wildlife discipline. Three terms are used in the wildlife section of the DEIS and are defined in the Glossary for those readers not familiar with their technical meanings.

Escape Terrain: In this DEIS, the term "escape terrain" is used only in the Wildlife section and is therefore intended only in that context.

Cover: Glossary has been changed to: (1) The combined aerial parts of plants and mulch. (2) Shelter and protection for animals and birds.

Growing Season: As defined in *A Glossary of Terms in Range Management.*

Management Action: The glossary has been changed to reflect your comment.

Phenology: As defined in *A Glossary of Terms in Range Management.*

Proper Utilization: As defined in *A Glossary of Terms in Range Management.*

Range Condition Rating: As defined in the Soil Conservation Service's *National Range Handbook.*

Range Improvement Projects: Narrative has been changed to read:

> Range Improvement. (1)Any structure or excavation to facilitate management of range or livestock. (2) Any practices designed to improve range condition or facilitate more efficient utilization of the range. (3)An increase in the grazing capacity of range.

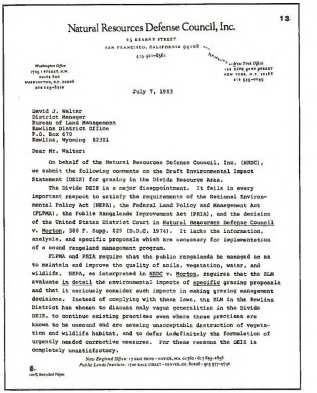
Range Readiness: As defined in *A Glossary of Terms in Range Management.*

Sacrifice Area: As defined in *A Glossary of Terms in Range Management.*

Stocking Rate: As defined in *A Glossary of Terms in Range Management.*

Surface Rehabilitation: BLM requires that a disturbed area be recontoured to its original contour. BLM is not allowed to reclaim areas with introduced species.

Utilization: As defined in *A Glossary of Terms in Range Management.*



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Natural Resources Defense Council, Inc.

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July 7, 1983

David J. Walter
District Manager
Bureau of Land Management
Rawlins District Office
P.O. Box 670
Rawlins, Wyoming 82301

Dear Mr. Walter:

On behalf of the Natural Resources Defense Council, Inc. (NRDC), we submit the following comments on the Draft Environmental Impact Statement (DEIS) for grazing in the Divide Resource Area.

The Divide DEIS is a major disappointment. It fails in every important respect to satisfy the requirements of the National Environmental Policy Act (NEPA), the Federal Land Policy and Management Act (FLPMA), the Public Rangelands Improvement Act (PRIA), and the decision of the United States District Court in Natural Resources Defense Council v. Morton, 388 F. Supp. 829 (D.D.C. 1974). It lacks the information, analysis, and specific proposals which are necessary for implementation of a sound rangeland management program.

FLPMA and PRIA require that the public rangelands be managed so as to maintain and improve the quality of soils, vegetation, water, and wildlife. NEPA, as interpreted in NRDC v. Morton, requires that the BLM evaluate in detail the environmental impacts of specific grazing proposals and that it seriously consider such impacts in making grazing management decisions. Instead of complying with these laws, the BLM in the Rawlins District has chosen to discuss only vague generalities in the Divide DEIS, to continue existing practices even where these practices are known to be unsound and are causing unacceptable destruction of vegetation and wildlife habitat, and so defer indefinitely the formulation of urgently needed corrective measures. For these reasons the DEIS is completely unsatisfactory.

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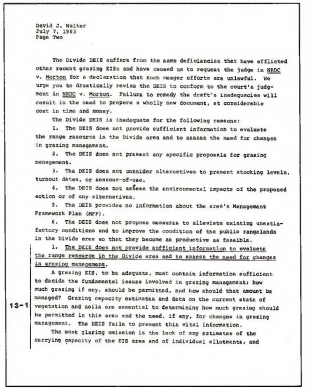


David J. Walter
July 7, 1983
Page Two

The Divide DEIS suffers from the same deficiencies that have afflicted other recent grazing EISs and have caused us to request the judge in NRDC v. Morton for a declaration that such meager efforts are unlawful. We urge you to drastically revise the DEIS to conform to the court's judgment in NRDC v. Morton. Failure to remedy the draft's inadequacies will result in the need to prepare a wholly new document, at considerable cost in time and money.

The Divide DEIS is inadequate for the following reasons:

1. The DEIS does not provide sufficient information to evaluate the range resource in the Divide area and to assess the need for changes in grazing management.

2. The DEIS does not present any specific proposals for grazing management.

3. The DEIS does not consider alternatives to present stocking levels, turnout dates, or season-of-use.

4. The DEIS does not address the environmental impacts of the proposed action or of any alternatives.

5. The DEIS provides no information about the area's Management Framework Plan (MFP).

6. The DEIS does not propose measures to alleviate existing unsatisfactory conditions and to improve the condition of the public rangelands in the Divide area so that they become as productive as feasible.

13-1 1. The DEIS does not provide sufficient information to evaluate the range resource in the Divide area and to assess the need for changes in grazing management.

A grazing EIS, to be adequate, must contain information sufficient to decide the fundamental issues involved in grazing management: how much grazing if any, should be permitted, and how should that amount be managed? Grazing capacity estimates and data on the current state of vegetation and soils are essential to determining how much grazing should be permitted in this area and the need, if any, for changes in grazing management. The DEIS fails to present this vital information.

The most glaring omission is the lack of any estimates of the carrying capacity of the EIS area and of individual allotments, and

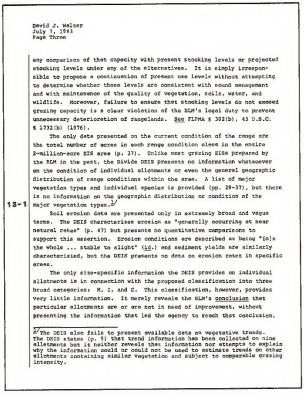
RESPONSES TO LETTER NO. 13

13-1 Instruction Memorandum No. 83-340 dated February 25, 1983, states, "Grazing EISs shall not display estimates of forage production or grazing capacities from SVIM inventories." The memo provides for determination of ecological range condition from SVIM inventory data and the use of the SCS range site guides to estimate initial stocking rates from the ecological condition ratings.

We believe that these stocking rate estimates should not be used in the Divide EIS area at this time. The range site guides are intended to be used to estimate stocking rates only in association with an on-site inspection by a professional range conservationist. The range conservationist should adjust the stocking rate estimate up or down from the rate suggested in the guide, based on his professional judgment, when he visits the site. Some of the following factors should be considered when making an estimate: yearly climatic changes; different precipitation zones (A range site in one zone because of slope, exposure, elevation, etc. can have the same appearance and production of a range site in a higher or lower precipitation zone.); upper to lower condition percentage within each class (good condition ranges from 51 percent to 75 percent); kind, class, season of use of livestock; large amounts of desirable or undesirable plants from a livestock grazing standpoint that may not have an effect on the conditon rating; and the management system for the particular area. These guidelines are interpreted from Section 308 and 802 of the SCS National Range Handbook. The above factors were not considered because the on-site inspections in the Divide area were done only to estimate species composition, not stocking rates.

An update of the acreage figures shows that 72 percent of the area is in good to excellent condition, 19 percent is in fair condition, and less than 1 percent is in poor condition. The acreage that was undetermined was 8 percent of the EIS area.

The condition of the Divide Resource Area indicates that forage production is very nearly in balance with current levels of consumption and more consumptive



David J. Walker
July 7, 1993
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any comparison of that capacity with present stocking levels or projected stocking levels under any of the alternatives. It is simply irresponsible to propose a continuation of present use levels without attempting to determine whether those levels are consistent with sound management and with maintenance of the quality of vegetation, soils, water, and wildlife. Moreover, failure to ensure that stocking levels do not exceed grazing capacity is a clear violation of the BLM's legal duty to prevent unnecessary deterioration of rangelands. See FLPMA § 302(b), 43 U.S.C. § 1732(b) (1976).

The only data presented on the current condition of the range are the total number of acres in each range condition class in the entire 2-million-acre EIS area (p. 27). Unlike most grazing EISs prepared by the BLM in the past, the Divide DEIS presents no information whatsoever on the condition of individual allotments or even the general geographic distribution of range conditions within the area. A list of major vegetation types and individual species is provided (pp. 29-37), but there is no information on the geographic distribution or condition of the major vegetation types.[2/]

13-1 Soil erosion data are presented only in extremely broad and vague terms. The DEIS characterizes erosion as "generally occurring at near natural rates" (p. 47) but presents no quantitative comparisons to support this assertion. Erosion conditions are described as being "[o]n the whole ... stable to slight" (p.) and sediment yields are similarly characterized, but the DEIS presents no data on erosion rates in specific areas.

The only site-specific information the DEIS provides on individual allotments is in connection with the proposed classification into three broad categories: M, I, and C. This classification, however, provides very little information. It merely reveals the BLM's conclusion that particular allotments are or are not in need of improvement, without presenting the information that led the agency to reach that conclusion.

[2/]The DEIS also fails to present available data on vegetative trends. The DEIS states (p. 5) that trend information has been collected on nine allotments but it neither reveals that information nor attempts to explain why the information could or could not be used to estimate trends on other allotments containing similar vegetation and subject to comparable grazing intensity.

use could probably be allowed in some areas. Displaying stocking rates calculated from the range site guides using the range condition write-ups for the Divide area would confirm this. However, as stated above, the guides are not intended to be used this way. This stocking rate information for the Divide area is available for review at the district office or copies can be made available on request.

Data on condition class for all allotments were not available at the time the Vegetation section of the EIS was written. It is available now and is included in a text addition as Appendix 7.

Sediment yields on 60 allotments sampled throughout the EIS area showed that on 59 allotments the yield was negligible to slight (0.58 to 1.45 tons/acre). Only one allotment (0451) showed a moderate yield of 2.03 tons per acre (see text change Appendix 8).

Appendix 8
Inventoried Allotments Containing Negligible to Slight Sediment Yields

0218	Seminoe	0506	Continental	0603	Bolten Ranch
0221	Stone	0508	Cottonwood Hill	0604	Coal Bank Wash
0403	Baggs Sub Unit	0509	Cow Creek	0605	Daley Ranch
0405	Beaver Dams	0510	Crooked Wash	0607	Echo Springs
0408	Cherokee	0510	Espitalier	0608	Emigrant
0412	Deep Gulch	0512	Grindstone Springs	0610	LaClede
0415	Doty Mountain	0513	Little Robber Mountain	0611	North Barrel
0417	Grizzly	0515	Mexican Flats	0615	Riner
0421	McCarty Canyon	0516	Mexican Graves	0616	Sixteen Mile
0423	Middlewood Hill	0517	Oppenheimer	0621	Tipton
0426	Morgan Ranch	0518	Poison Buttes	0623	Pine Grove
0430	Sage Creek	0519	Powder Mountain	0701	Bell Springs
0433	Sulphur Springs	0520	Powder Rim	0707	Haystack
0447	Mountain Pasture	0521	Red Creek	0708	Haystack River Pasture
0448	J O Pastures	0523	Rotten Springs	0711	Monument Lake
0455	Sage Creek Ranch	0524	Sand Creek	0719	Separation Flats
0456	Deep Creek Pasture	0525	South Barrel	1101	Airheart Pasture
0502	Adobe Town	0527	V Spreaders	1130	South Pasture
0503	Big Robber	0528	Willow Creek	4005	Maneotis Crooked Wash
0505	Cherokee Trail	0601	Badwater		

APPENDIX 7
PART 1
BLM ACREAGE OF ALLOTMENTS BY CONDITION CLASS

Allotment Number	Allotment Name	Condition Class				
		Excellent	Good	Fair	Poor	Undetermined[1]
0201[2]	Buzzard	200.3	22,768.7	22,217.0	936.7	11,488.3
0202	Buzzard Ranch Meadows	0.0	540.9	428.3	0.0	92.4
0203[2]	Cherry Creek	816.6	5,019.4	15,324.0	126.4	4,789.5
0204[2]	Desert Claim	0.0	162.0	196.8	0.0	0.0
0205[2]	Devils Gate	865.9	18,675.4	20,063.3	380.4	5,960.7
0207[2]	Ferris Mountains	6,055.6	17,922.3	9,748.2	86.9	3,577.6
0209[2]	Junk Creek	0.0	1,636.1	8,531.1	194.6	324.9
0212[2]	Long Creek	0.0	1,439.3	3,085.5	0.0	2,787.5
0215[2]	Pole Canyon	0.0	2,859.5	154.0	0.0	1,961.5
0216[2]	Sand Creek	0.0	225.7	1,863.6	0.0	149.0
0217	Sand Creek Ranch Pasture	13.8	369.7	100.1	8.0	231.4
0218[2]	Seminoe	7,296.9	46,648.0	26,069.7	520.6	3,642.8
0219[2]	Station 8	0.0	2,337.0	3,520.2	0.0	25.9
0220[2]	Tapers	152.9	52.9	435.5	0.0	129.3
0221[2]	Stone	14,709.2	35,674.5	17,939.7	3,876.1	7,261.4
0222[2]	Wood Creek	0.0	337.9	929.4	290.0	8.2
0223	Wood Creek Ranch Pasture	0.0	0.0	139.5	10.4	51.0
0401[3]	Airport	12.6	559.9	236.4	0.0	0.0
0402[3]	Antelope	0.0	768.7	298.3	0.0	7.0
0403	Baggs Subunit	320.7	3,000.8	113.0	0.0	628.3
0405	Beaver Dams	75.0	3,032.8	250.6	0.0	122.1
0406[3]	Boden	—	—	—	—	—
0407[3]	Centennial Creek	2,087.4	4,061.2	180.3	0.0	558.4
0408	Cherokee	5,242.1	42,625.8	8,869.5	554.2	7,395.6
0409[3]	Cottonwood Draw	11.0	554.8	1,552.7	0.0	26.0
0410[3]	Coyote Draw	0.0	4,173.9	113.1	0.0	22.0
0411[3]	Cushing	138.5	4,669.0	226.0	87.0	125.2
0412	Deep Gulch	3,378.0	12,631.4	4,430.5	0.0	5,726.8
0413[3]	Dirty Man	0.0	13.9	125.1	0.0	0.0
0414[3]	Dish	617.4	8,469.9	5,543.3	51.7	95.3
0415	Doty Mountain	10,488.5	37,369.6	4,352.6	0.0	4,921.8
0417[3]	Grizzly	827.6	23,478.4	3,579.3	0.0	1,915.5
0418[3]	Hartt Creek	87.6	1,786.2	502.0	0.0	842.5

APPENDIX 7
PART 1—CONTINUED

Allotment Number	Allotment Name	Condition Class				
		Excellent	Good	Fair	Poor	Undetermined[1]
0419[3]	Jack Creek	—	—	—	—	—
0420[3]	Little Jack Creek	114.3	1,662.0	370.5	0.0	103.7
0421[3]	McCarty Canyon	140.6	1,966.3	456.9	0.0	452.4
0422[3]	Methodist	—	—	—	—	—
0423[3]	Middlewood Hill	1,003.3	9,144.1	2,699.5	0.0	1,030.3
0425[3]	Morgan Creek	51.0	3,119.4	1,365.5	0.0	134.7
0426	Morgan Ranch	81.2	723.3	46.4	0.0	0.0
0427[3]	North Spring Creek	3.6	741.9	357.3	12.6	57.6
0428[3]	Cherokee Creek	—	—	—	—	—
0429[3]	Rich	511.6	4,653.7	246.6	361.6	15.4
0430[3]	Sage Creek	147.1	9,208.5	2,637.2	0.0	1,900.7
0431[3]	Savery Creek	129.8	1,961.7	596.9	0.0	125.0
0432[3]	Snow Creek	0.0	3,303.7	1,235.8	0.0	80.2
0433	Sulpher Springs	637.6	9,018.2	1,564.6	20.9	296.5
0434[3]	Twingroves	—	—	—	—	—
0435	Wild Cow	702.9	6,345.3	637.3	0.0	5.7
0436[3]	Windmill	1,453.3	1,772.0	86.8	128.5	7.0
0437[3]	Hill Isolated Tract	0.0	139.0	29.0	0.0	24.0
0440[3]	Bartlett Isolated Tract	6.0	95.0	58.0	0.0	5.0
0441[3]	North Pasture	0.0	341.0	0.0	0.0	0.0
0442[3]	Horse Pasture	74.7	73.4	20.3	15.4	9.0
0443	East Muddy	1,465.4	2,643.3	540.1	0.0	864.9
0444[3]	Truck Drivers Creek	0.0	62.0	0.0	0.0	96.0
0445	H.R. Holding Pasture	0.0	706.3	0.0	0.0	0.0
0446	Antelope Isolated Tract	0.0	175.0	0.0	0.0	24.7
0447	Mountain Pasture	0.0	1,072.9	21.0	0.0	0.0
0448	J O Pasture	0.0	772.7	267.4	54.0	34.4
0449[3]	Sierra Madre Ranch	—	—	—	—	—
0450[3]	Standard	2,307.3	6,508.8	2,288.6	114.3	0.0
0451[3]	Jim Berger	0.0	99.0	45.0	0.0	0.0
0453[3]	Thomas & Irma Ryan	0.0	81.6	277.4	0.0	0.0
0454[3]	Spring Creek	0.0	39.0	0.0	0.0	29.0
0455	Sage Creek Ranch	262.5	1,379.5	223.1	0.0	225.7
0456	Deep creek Pasture	2.0	1,632.0	894.8	31.0	63.6
0457	West Wild Cow	0.0	2,243.1	282.1	0.0	911.3
0459	Ketchum Buttes	27.0	217.7	613.2	0.0	29.0

APPENDIX 7
PART 1—CONTINUED

Allotment Number	Allotment Name	Condition Class				
		Excellent	Good	Fair	Poor	Undetermined[1]
0501	Adam's Ranch	—	—	—	—	—
0502	Adobe Town	4,038.9	11,517.5	13,157.5	0.0	2,267.8
0503	Big Robber	1,429.9	14,040.4	424.2	0.0	1,388.9
0504	Dad	0.0	680.0	80.0	0.0	0.0
0505	Cherokee Trail	3,128.1	7,112.1	1,450.8	0.0	1.3
0506	Continental	971.8	18,205.8	3,238.3	1,217.8	3,045.9
0507	Corson Springs	3,516.9	8,970.0	1,259.9	10.8	16.0
0508	Cottonwood Hill	2,485.6	5,523.1	2,783.6	0.0	2,847.1
0509	Cow Creek	5,321.5	41,552.0	6,400.8	123.2	11,349.1
0510	Crooked Wash	1,626.3	5,263.7	242.4	0.0	86.0
0511	Espitalier	3,856.4	13,944.4	5,233.5	0.0	729.6
0512	Grindstone Springs	273.0	5,967.4	1,501.3	0.0	819.4
0513	Little Powder Mountain	6,982.2	6,683.8	2,018.1	0.0	172.0
0514	Little Robber	0.0	68.7	265.2	0.0	81.0
0515	Mexican Flats	3,652.7	9,308.0	185.6	0.0	1,707.9
0516	Mexican Graves	2,332.0	11,038.3	4,279.9	0.0	268.4
0517	Oppenheimer	1,019.0	6,925.5	1,267.6	85.6	2,683.3
0518	Poison Buttes	1,557.7	4,278.6	125.0	0.0	600.9
0519	Powder Mountain	2,557.9	6,045.4	565.0	0.0	456.4
0520	Powder Rim	6,229.5	34,710.3	2,222.6	0.0	3,453.0
0521	Red Creek	6,222.0	33,072.9	7,266.2	0.0	3,297.3
0522	River Bottom	13.0	963.0	0.0	0.0	0.0
0523	Rotten Springs	2,878.8	13,769.8	2,104.2	0.0	2,406.1
0524	Sand Creek	626.0	17,192.6	6,751.6	0.0	4,742.2
0525	South Barrel	401.4	7,739.9	841.7	0.0	877.4
0527	V Spreaders	4.2	309.0	2.8	0.0	0.0
0528	Willow Creek	12,909.6	41,038.1	12,159.3	357.2	11,764.8
0529	Headquarters Ranch	0.0	56.8	27.0	0.0	68.0
0530	South Muddy	128.0	995.4	245.0	0.0	93.0
0531	George Dew	0.0	152.9	99.2	0.0	8.8
0601	Badwater	84.2	8,258.5	484.5	81.9	1,276.6
0602	Bull Canyon	251.2	220.0	88.9	0.0	332.7
0603[3]	Bolton Ranch	—	—	—	—	—
0604	Coal Bank Wash	173.7	2,519.9	1,084.8	0.0	29.0

APPENDIX 7
PART 1—CONTINUED

Allotment Number	Allotment Name	Condition Class				
		Excellent	Good	Fair	Poor	Undetermined[1]
0605	Daley Ranch	464.9	8,141.9	610.7	0.0	1,467.0
0606[3]	Doolittle	0.0	281.0	0.0	0.0	0.0
0607	Echo Springs	4,370.7	12,900.5	1,243.3	299.0	2,029.8
0608[3]	Emigrant	15.0	767.9	130.0	0.0	185.0
0609	Filmore	1,148.7	15,850.1	1,626.6	0.0	962.0
0610	LaClede	14,734.8	35,114.2	4,557.4	0.0	1,502.2
0611	North Barrel	7,288.6	18,216.9	3,180.7	103.4	563.5
0612	North Pine Butte	293.6	620.8	0.0	0.0	414.5
0613	Platte River	122.0	1,896.0	1,900.9	18.8	51.3
0614	Olson Ranch Pasture	0.0	4.0	0.0	0.0	0.0
0615	Riner	1,338.3	18,757.1	1,385.0	19.3	1,130.1
0616[3]	Sixteen Mile	6,738.6	15,369.5	2,041.3	535.6	4,455.8
0619	South Red Desert	277.3	4,192.3	480.3	0.0	126.0
0620	South Wamsutter	2,991.6	9,961.5	797.4	0.0	630.3
0621	Tipton	11,086.0	14,935.1	2,576.1	0.0	769.7
0623[3]	Pine Grove	249.3	12,201.9	11,599.4	545.4	147.6
0624	Daley Ranch Pasture	0.0	772.2	7.0	0.0	9.7
0625	South Pine Butte	0.0	91.0	77.9	0.0	25.9
0626	44 Ranch	2,197.7	5,861.8	549.6	80.8	0.0
0701	Bell Springs	275.6	5,983.1	1,867.5	245.4	36.5
0702	Bell Springs Ranch Pasture	8.0	170.6	100.6	2.8	1.0
0703[3]	East City Limits	0.0	407.0	1,578.0	0.0	0.0
0704[3]	East Sinclair	—	—	—	—	—
0706	G.L.	1,917.3	6,280.6	678.4	95.0	228.8
0707	Haystack	7,042.0	20,160.2	3,723.0	1,439.3	683.8
0708[3]	Haystack River Pasture	—	—	—	—	—
0709	Jawbone	5,058.5	11,336.2	1,927.0	1.0	632.5
0710	Monument Draw	2,164.9	6,489.3	5,718.4	799.8	121.5
0711	Monument Lake	15,207.7	28,045.4	11,312.7	119.5	1,285.5
0713	North Creston-West	2,021.5	7,521.8	994.0	3.7	54.0
0714	Latham	3,164.6	13,929.2	2,218.1	84.6	476.9
0715	North Tipton	5,158.2	14,578.5	13,707.6	0.0	899.0
0716	North Wamsutter	4,468.8	16,727.2	5,099.8	249.1	783.0
0717	Ruby Knolls	3,408.7	9,269.6	2,135.6	301.0	151.7

APPENDIX 7
PART 1—CONTINUED

Allotment Number	Allotment Name	Condition Class				
		Excellent	Good	Fair	Poor	Undetermined[1]
0718	Sandstone	7,154.0	29,241.8	2,758.3	0.0	606.9
0719	Separation Flats	9,121.6	36,708.4	9,511.6	1,017.3	1,036.3
0720	Shamrock Hills	3,518.3	10,738.4	4,051.9	30.6	933.8
0721	D.O.	890.9	11,551.6	3,594.3	1,219.1	197.2
0722	Chain Lakes	6,631.6	19,986.9	2,612.1	169.0	166.9
0723[2]	Shamrock Pasture	1.8	33.8	58.0	0.0	11.4
1101	Airheart Pasture	150.0	347.7	0.0	0.0	0.0
1102[2]	Big Gulch	0.0	59.9	95.0	0.0	0.0
1103[2]	West Brown's Hill	168.3	195.7	93.5	0.0	131.4
1104[2]	Cedar Ridge	—	—	—	—	—
1106[2]	Cushing	0.0	18.4	182.8	0.0	2.6
1107[2]	Dolan	—	—	—	—	—
1108[2]	Etherington	0.0	58.0	17.9	0.0	0.0
1109[2]	Fly Creek	0.0	222.0	304.9	0.0	23.1
1110[2]	Hell Canyon	0.0	703.1	90.0	0.0	314.7
1111	Hill Pasture	143.0	145.8	14.0	0.0	0.0
1112[2]	Little Horse Mountain	0.0	109.4	572.1	0.0	43.5
1113[2]	Little Sandstone	83.2	690.6	132.1	0.0	422.0
1114[2]	McCargar Draw	0.0	435.9	155.6	0.0	0.0
1115[2]	McCary	0.0	264.9	13.1	0.0	12.0
1116[2]	McIntosh Horse Mountain	18.0	548.0	47.0	0.0	0.0
1117[2]	Mexican Meadows	20.0	209.9	0.0	0.0	47.0
1118[2]	Morgan-Boyer S.U.	600.4	4,036.3	1,877.3	0.0	773.7
1120[2]	North Rye Grass	0.0	57.9	165.5	0.0	9.5
1121[2]	Pioneer Draw	0.0	167.0	0.0	0.0	0.0
1122	Poling Isolated Tract	—	—	—	—	—
1123[2]	Rasmussen S.U.	164.8	3,571.3	1,251.2	0.6	86.8
1124[2]	Reader	202.0	197.9	22.9	0.0	0.0
1125[2]	Reader Basin Pasture	56.4	88.0	14.0	0.0	63.6
1126[2]	Road Gulch	0.0	481.3	292.6	14.4	134.6
1127[2]	Sheep Mountain	0.0	265.0	3.0	0.0	16.0
1128[2]	Short	0.0	825.2	180.7	0.0	1.0
1129	South Baggs	0.0	224.0	0.0	0.0	0.0
1130	South Pasture	4.0	499.7	0.0	0.0	0.0

APPENDIX 7
PART 1—CONTINUED

Allotment Number	Allotment Name	Condition Class				
		Excellent	Good	Fair	Poor	Undertermined[1]
1131[3]	South Rye Grass	0.0	174.2	22.8	0.0	0.0
1132[3]	Spring Gulch	0.0	86.5	336.5	13.0	65.9
1133[3]	Standard	30.0	436.1	58.4	0.0	10.3
1134	Stateline 40	0.0	36.9	0.0	0.0	0.0
1135[3]	Willow Creek	—	—	—	—	—
1136[3]	Battle Mountain Isolated Tract	0.0	17.0	57.0	0.0	0.0
1137[3]	C.A. McKee Isolated Tract	5.0	54.0	0.0	0.0	0.0
1138[3]	M.J. Anderson Isolated Tract #1	0.0	138.0	0.0	0.0	0.0
1139[3]	Cobb Cattle Co. Isolated Tract	0.0	105.2	80.0	0.0	48.8
1140[3]	Grieve Reservoir Pasture	0.0	26.9	15.4	0.0	1.7
1141[3]	M.J.Anderson Isolated Tract #2	—	—	—	—	—
1142[3]	East Browns Hill	0.0	368.1	29.2	0.0	37.6
1143[3]	L.U. Grieve Pasture	0.0	195.0	10.0	0.0	0.0
1144[3]	Coal Bank Draw	—	—	—	—	—
1012[3]	Silver Spur North	—	—	—	—	—
1128[3]	Plattoga Ranch	93.0	762.0	1,646.0	0.0	0.0
1130[3]	V.T. Swanson	514.0	927.1	0.0	0.0	351.9
1035[3]	Willford Ranches	0.0	114.0	0.0	0.0	44.0
1037[3]	Lazy River Ranch	—	—	—	—	—
0323[2]	Black Canyon	—	—	—	—	—
Total		**268,460.62**	**1,156,850.0**	**371,027.9**	**17,145.3**	**153,544.8**

[1]These areas include: (1) plant communities for which no range site descriptions exist; (2) meadow plant communities that are not adequately described in the range site descriptions; (3) disturbed sites such as roads, borrow pits, pipelines, corrals, etc.; and (4) barren or waste areas such as badlands, playas, and rock outcrops, which are geographic land types and not actual range sites.

[2]These allotments include significant acreage of threadleaf sedge and/or sand dune sites that comprise a majority of the poor or fair condition sites. These sites are believed to be in better condition than rated because of inadequate range site descriptions. The BLM, SCS, and University of Wyoming are studying these sites to determine if revised guides are needed.

[3]These allotments were only partially mapped for range site condition or were not surveyed at all. Thus, the acreage listed is incomplete for both private and/or federal lands in these allotments.

APPENDIX 7
PART 2
TOTAL ACREAGE OF ALLOTMENTS BY CONDITION CLASS

Allotment Number	Allotment Name	Condition Class				
		Excellent	Good	Fair	Poor	Undetermined[1]
0201[2]	Buzzard	641.2	30,182.1	30,310.7	1,533.5	17,780.0
0202	Buzzard Ranch Meadows	0.0	1,119.4	2,144.0	0.0	776.0
0203[2]	Cherry Creek	873.0	6,556.3	18,394.2	137.3	6,363.0
0204[2]	Desert Claim	0.0	304.3	257.3	0.0	0.0
0205[2]	Devils Gate	950.9	19,919.7	20,908.7	625.4	6,170.9
0207[2]	Ferris Mountains	6,813.7	21,894.2	11,407.5	108.8	4,584.7
0209[2]	Junk Creek	0.0	1,785.0	9,556.0	194.6	475.0
0212[2]	Long Creek	0.0	1,997.0	5,514.7	0.0	4,356.8
0215[2]	Pole Canyon	0.0	3,003.0	154.3	0.0	2,280.7
0216[2]	Sand Creek	0.0	237.7	2,210.3	0.0	185.0
0217	Sand Creek Ranch Pasture	25.8	2,116.7	537.0	324.0	1,685.9
0218[2]	Seminoe	14,918.8	80,314.9	44,800.2	1,408.7	6,407.6
0219[2]	Station 8	0.0	2,355.6	3,558.6	0.0	25.9
0220[2]	Tapers	226.0	52.9	505.3	0.0	146.1
0221[2]	Stone	16,290.4	51,219.9	26,512.0	5,238.2	10,352.9
0222[2]	Wood Creek	0.0	449.9	934.4	336.0	8.2
0223	Wood Creek Ranch Pasture	0.0	0.0	173.5	10.4	113.0
0401[3]	Airport	12.8	721.0	248.0	0.0	0.0
0402[3]	Antelope	0.0	769.7	304.3	0.0	7.0
0403	Baggs Subunit	519.8	6,322.5	120.0	0.0	1,388.1
0405	Beaver Dams	96.8	4,620.9	517.2	0.0	193.1
0406[3]	Boden	—	—	—	—	—
0407[3]	Centennial Creek	2,087.4	4,620.9	187.3	0.0	583.4
0408	Cherokee	5,449.6	47,484.5	10,841.2	671.9	7,934.6
0409[3]	Cottonwood Draw	11.0	561.0	1,556.0	0.0	27.0
0410[3]	Coyote Draw	0.0	4,175.9	113.1	0.0	22.0
0411[3]	Cushing	138.5	4,684.2	230.2	88.6	126.2
0412	Deep Gulch	4,444.4	17,758.8	5,789.0	0.0	6,137.3
0413[3]	Dirty Man	0.0	14.3	128.7	0.0	0.0
0414[3]	Dish	625.9	8,516.4	5,571.9	51.7	118.7
0415	Doty Mountain	15,314.7	51,583.2	6,556.2	0.0	7,276.3
0417[3]	Grizzly	1,552.9	31,073.6	5,063.4	0.0	2,636.0

APPENDIX 7
PART 2—CONTINUED

Allotment Number	Allotment Name	Condition Class				
		Excellent	Good	Fair	Poor	Undetermined[1]
0418[3]	Hartt Creek	96.6	1,864.0	530.3	0.0	877.0
0419[3]	Jack Creek	—	—	—	—	—
0420[3]	Little Jack Creek	114.3	1,743.7	371.2	0.0	107.0
0421[3]	McCarty Canyon	446.3	5,191.0	1,289.5	0.0	1,225.9
0422[3]	Methodist	—	—	—	—	—
0423[3]	Middlewood Hill	1,161.4	11,466.6	3,760.4	0.0	1,627.3
0425[3]	Morgan Creek	51.0	3,244.4	1,405.2	0.0	144.9
0426	Morgan Ranch	115.2	1,492.1	537.1	0.0	0.0
0427[3]	North Spring Creek	3.6	800.3	430.4	26.8	87.9
0428[3]	Cherokee Creek	—	—	—	—	—
0429[3]	Rich	512.4	4,683.5	246.9	364.7	15.4
0430[3]	Sage Creek	327.9	19,489.5	6,654.1	0.0	3,363.9
0431[3]	Savery Creek	131.9	2,025.4	654.1	0.0	133.5
0432[3]	Snow Creek	0.0	3,310.7	1,243.3	0.0	80.7
0433	Sulpher Springs	798.6	16,641.0	2,459.9	115.6	471.5
0434[3]	Twingroves	—	—	—	—	—
0435	Wild Cow	916.5	7,762.1	647.3	0.0	16.2
0436[3]	Windmill	1,461.7	1,781.5	87.6	128.5	7.0
0437	Hill Isolated Tract	0.0	139.0	29.0	0.0	24.0
0440	Bartlett Isolated Tract	6.0	95.0	58.0	0.0	5.0
0441	North Pasture	6.0	95.0	58.0	0.0	0.0
0442	Horse Pasture	0.0	341.0	0.0	0.0	0.0
0443	East Muddy	1,465.4	2,643.3	540.1	0.0	864.9
0444	Truck Drivers Creek	0.0	62.0	0.0	0.0	96.0
0445	H.R. Holding Pasture	0.0	706.3	0.0	0.0	0.0
0446	Antelope Isolated Tract	0.0	175.0	0.0	0.0	24.7
0447	Mountain Pasture	0.0	1,072.9	21.0	0.0	0.0
0448	J O Pasture	0.0	772.7	267.4	54.0	34.4
0449	Sierra Madre Ranch	—	—	—	—	—
0450	Standard	2,307.3	6,508.8	2,288.6	114.3	0.0
0451	Jim Berger	0.0	99.0	45.0	0.0	0.0
0453	Thomas & Irma Ryan	0.0	81.6	277.4	0.0	0.0
0454	Spring Creek	0.0	39.0	0.0	0.0	29.0
0455	Sage Creek Ranch	262.5	1,379.5	223.1	0.0	225.7
0456	Deep creek Pasture	2.0	1,632.0	894.8	31.0	63.6

APPENDIX 7
PART 2—CONTINUED

Allotment Number	Allotment Name	Condition Class				
		Excellent	Good	Fair	Poor	Undetermined[1]
0457	West Wild Cow	0.0	2,243.1	282.1	0.0	911.3
0459	Ketchum Buttes	27.0	217.7	613.2	0.0	29.0
0501	Adam's Ranch	—	—	—	—	—
0502	Adobetown	4,038.9	11,517.5	13,157.5	0.0	2,267.8
0503	Big Robber	1,509.9	15,193.4	541.6	0.0	1,389.1
0504	Dad	0.0	682.0	80.0	0.0	0.0
0505	Cherokee Trail	3,128.1	7,112.1	1,450.8	0.0	1.3
0506	Continental	971.8	18,281.6	3,238.3	1,217.8	3,058.0
0507	Corson Springs	3,886.8	9,804.0	1,338.3	14.2	43.2
0508	Cottonwood Hill	3,298.5	6,009.8	2,794.6	0.0	3,013.2
0509	Cow Creek	5,632.3	43,685.5	6,733.0	123.2	11,349.4
0510	Crooked Wash	1,626.3	5,503.1	301.2	0.0	96.7
0511	Espitalier	3,921.1	14,569.9	5,567.6	0.0	819.6
0512	Grindstone Springs	273.0	5,977.4	1,501.3	0.0	883.4
0513	Little Powder Mountain	7,230.9	7,075.6	2,479.7	0.0	223.1
0514	Little Robber	0.0	68.7	265.2	0.0	81.0
0515	Mexican Flats	3,710.2	9,605.8	185.6	0.0	2,073.3
0516	Mexican Graves	2,828.0	12,317.3	4,553.9	0.0	341.1
0517	Oppenheimer	1,700.9	8,005.1	1,274.6	85.6	2,719.3
0518	Poison Buttes	1,753.7	6,560.9	145.0	0.0	1,022.1
0519	Powder Mountain	3,093.8	6,798.6	624.6	0.0	841.4
0520	Powder Rim	6,230.4	35,039.3	2,313.8	0.0	3,480.7
0521	Red Creek	6,276.0	34,078.5	7,428.8	0.0	3,366.0
0522	River Bottom	13.0	963.0	0.0	0.0	0.0
0523	Rotten Springs	2,878.8	13,769.8	2,104.2	0.0	2,406.1
0524	Sand Creek	626.0	17,192.6	6,751.6	0.0	4,742.2
0525	South Barrel	401.4	7,739.9	841.7	0.0	877.4
0527	V Spreaders	4.2	309.0	2.8	0.0	0.0
0528	Willow Creek	12,909.6	41,038.1	12,159.3	357.2	11,764.8
0529	Headquarters Ranch	0.0	56.8	27.0	0.0	68.0
0530	South Muddy	128.0	995.4	245.0	0.0	93.0
0531	George Dew	0.0	152.9	99.2	0.0	8.8
0601	Badwater	84.2	8,258.5	484.5	81.9	1,276.6
0602	Bull Canyon	251.2	220.0	88.9	0.0	332.7
0603	Bolton Ranch	—	—	—	—	—

APPENDIX 7
PART 2—CONTINUED

Allotment Number	Allotment Name	Excellent	Good	Fair	Poor	Undetermined[1]
0604	Coal Bank Wash	340.8	4,968.6	2,244.3	0.0	58.0
0605	Daley Ranch	1,026.2	17,970.1	1,667.5	0.0	3,360.1
0606[3]	Doolittle	0.0	744.9	0.0	0.0	0.0
0607	Echo Springs	8,726.5	29,221.1	2,454.9	379.9	4,133.3
0608[3]	Emigrant	382.3	4,366.3	1,108.6	0.0	677.8
0609	Filmore	2,833.4	33,862.2	3,669.9	0.0	1,697.9
0610	LaClede	24,595.4	59,941.7	8,357.5	0.0	2,210.3
0611	North Barrel	14,125.8	35,108.7	6,853.3	174.8	1,115.2
0612	North Pine Butte	787.7	950.3	12.0	0.0	643.8
0613	Platte River	213.0	1,925.3	2,040.9	19.4	54.4
0614	Olson Ranch Pasture	0.0	4.0	0.0	0.0	0.0
0615	Riner	3,572.9	38,588.0	3,174.0	34.7	2,139.7
0616[3]	Sixteen Mile	14,511.7	31,922.7	5,256.2	1,123.8	9,736.1
0619	South Red Desert	1,068.3	7,647.5	1,167.9	0.0	489.0
0620	South Wamsutter	6,535.0	21,632.3	1,893.7	4.3	1,674.3
0621	Tipton	22,142.3	29,670.2	5,453.9	0.0	1,804.6
0623[3]	Pine Grove	979.5	28,544.9	24,919.6	1,830.9	579.9
0624	Daley Ranch Pasture	0.0	2,265.3	16.0	0.0	49.4
0625	South Pine Butte	0.0	549.0	296.8	0.0	158.7
0626	44 Ranch	4,660.3	12,098.7	873.2	167.7	0.0
0701	Bell Springs	418.7	13,608.7	4,281.6	653.9	100.9
0702	Bell Springs Ranch Pasture	62.8	232.3	254.3	7.6	74.0
0703[3]	East City Limits	0.0	685.0	2,790.0	0.0	0.0
0704[3]	East Sinclair	—	—	—	—	—
0706	G.L.	4,237.9	11,552.2	1,909.9	263.8	408.4
0707	Haystack	15,534.6	42,553.9	8,146.5	2,980.0	1,285.9
0708[3]	Haystack River Pasture	—	—	—	—	—
0709	Jawbone	8,242.0	19,665.3	4,275.6	9.3	1,104.5
0710	Monument Draw	2,167.7	6,494.6	5,722.6	800.4	121.5
0711	Monument Lake	32,970.6	57,997.5	22,875.7	334.7	2,717.8
0713	North Creston-West	2,053.3	7,595.0	998.7	3.7	54.0
0714	Latham	6,300.5	27,324.3	4,806.9	160.9	1,103.5
0715	North Tipton	11,836.8	30,566.4	27,895.5	0.0	1,688.4
0716	North Wamsutter	9,770.8	33,800.9	11,499.7	354.1	1,307.1
0717	Ruby Knolls	6,099.7	17,891.2	5,018.4	578.6	440.1

APPENDIX 7
PART 2—CONTINUED

Allotment Number	Allotment Name	Excellent	Good	Fair	Poor	Undetermined[1]
0718	Sandstone	16,415.5	65,772.4	6,576.1	0.0	1,265.6
0719	Separation Flats	19,432.0	72,774.2	16,667.2	2,080.1	1,996.3
0720	Shamrock Hills	7,615.3	20,770.4	8,350.8	48.0	2,196.0
0721	D.O.	2,096.9	19,924.6	7,348.1	1,681.9	221.5
0722	Chain Lakes	14,518.4	40,864.5	5,274.6	204.0	221.5
0723[2]	Shamrock Pasture	504.2	1,018.9	877.3	0.0	66.3
1101	Airheart Pasture	498.0	1,159.5	0.0	0.0	0.0
1102[3]	Big Gulch	0.0	64.9	98.0	0.0	0.0
1103[3]	West Brown's Hill	172.0	202.2	388.3	0.0	134.0
1104[3]	Cedar Ridge	—	—	—	—	—
1106[3]	Cushing	0.0	19.2	193.7	0.0	2.8
1107[3]	Dolan	—	—	—	—	—
1108[3]	Etherington	0.0	58.0	17.9	0.0	0.0
1109[3]	Fly Creek	0.0	225.4	306.9	0.0	23.7
1110[3]	Hell Canyon	0.0	710.7	91.5	0.0	320.5
1111	Hill Pasture	294.0	768.4	140.8	0.0	0.0
1112[3]	Little Horse Mountain	0.0	109.4	577.1	0.0	43.5
1113[3]	Little Sandstone	85.7	915.2	223.8	0.0	422.0
1114[3]	McCargar Draw	0.0	443.2	158.2	0.0	0.0
1115[3]	McCary	0.0	280.1	14.9	0.0	14.0
1116[3]	McIntosh Horse Mountain	20.0	562.0	47.0	0.0	0.0
1117[3]	Mexican Meadows	21.6	216.3	0.0	0.0	49.0
1118[3]	Morgan-Boyer S.U.	634.2	4,120.3	1,991.3	0.0	795.7
1120[3]	North Rye Grass	0.0	71.5	173.9	0.0	10.3
1121[3]	Pioneer Draw	0.0	171.0	0.0	0.0	11.0
1122	Poling Isolated Tract	—	—	—	—	—
1123[3]	Rasmussen S.U.	283.6	6,791.8	1,687.1	57.4	117.5
1124[3]	Reader	202.0	200.9	22.9	0.0	0.0
1125[3]	Reader Basin Pasture	61.6	91.0	15.0	0.0	65.4
1126[3]	Road Gulch	0.0	505.5	298.9	15.4	155.9
1127[3]	Sheep Mountain	0.0	296.7	3.0	0.0	19.3
1128[3]	Short	0.0	828.2	180.7	0.0	1.0
1129	South Baggs	0.0	225.0	0.0	0.0	0.0
1130	South Pasture	171.0	4,714.4	309.0	0.0	0.0
1131[3]	South Rye Grass	0.0	177.2	22.8	0.0	0.0

APPENDIX 7
PART 2—CONTINUED

Allotment Number	Allotment Name	Excellent	Good	Fair	Poor	Undertermined[1]
1132[3]	Spring Gulch	—	88.6	343.3	13.0	68.0
1133[3]	Standard	31.0	450.9	59.4	0.0	15.4
1134	Stateline 40	0.0	36.9	0.0	0.0	0.0
1135[3]	Willow Creek	—	—	—	—	—
1136[3]	Battle Mountain Isolated Tract	0.0	17.0	64.0	0.0	0.0
1137[3]	C.A. McKee Isolated Tract	10.0	66.0	0.0	0.0	0.0
1138[3]	M.J. Anderson Isolated Tract #1	0.0	265.0	0.0	0.0	0.0
1139[3]	Cobb Cattle Co. Isolated Tract	0.0	115.2	81.0	0.0	48.8
1140[3]	Grieve Reservoir Pasture	0.0	28.3	19.8	0.0	1.9
1141[3]	M.J.Anderson Isolated Tract #2	—	—	—	—	—
1142[3]	East Browns Hill	0.0	807.1	29.9	0.0	40.8
1143[3]	L.U. Grieve Pasture	0.0	198.0	11.0	0.0	0.0
1144[3]	Coal Bank Draw	—	—	—	—	—
1012[3]	Silver Spur North	—	—	—	—	—
1128[3]	Plattoga Ranch	93.0	766.0	1,649.6	0.0	0.0
1130[3]	V.T. Swanson	514.0	942.2	0.0	0.0	359.8
1035[3]	Willford Ranches	0.0	116.0	0.0	0.0	44.0
1037[3]	Lazy River Ranch	—	—	—	—	—
0323[2]	Black Canyon	—	—	—	—	—
Total		**430,177.12**	**1,754,784.3**	**551,191.2**	**27,632.4**	**149,294.2**

[1]These areas include: (1) plant communities for which no range site descriptions exist; (2) meadow plant communities that are not adequately described in the range site descriptions; (3) disturbed sites such as roads, borrow pits, pipelines, corrals, etc.; and (4) barren or waste areas such as badlands, playas, and rock outcrops, which are geographic land types and not actual range sites.

[2]These allotments include signifcant acreage of threadleaf sedge and/or sand dune sites that comprise a majority of the poor or fair condition sites. These sites are believed to be in better condition than rated because of inadequate range site descriptions. The BLM, SCS, and University of Wyoming are studying these sites to determine if revised guides are needed.

[3]These allotments were only partially mapped for range site condition or were not surveyed at all. Thus, the acreage listed is incomplete for both private and/or federal lands in these allotments.

By presenting only conclusions, the DEIS fails to fulfill a principal purpose of any EIS -- permitting the public to determine independently whether the agency's decisions are justified by the available information.

Moreover, the conclusory information that is provided is essentially useless. For example, for category 4 allotments, the reader is informed only that "one or more" of eight broad factors were present (pp. 2-9).[2/] For category 2 there is a table listing the factors present in individual allotments (pp. 11-14), but the factors are so broad and vague (for example, "significant range suitability problems exist on the allotment" (factor 5 under Category 2 characteristics, p. 9)) that the table is virtually useless.[3/]

The sketchy information presented on vegetation (p. 17) and erosion (p. 47) seems to indicate that most of the range in the Divide area is in fairly good shape. On the other hand, statements elsewhere in the DEIS (see, e.g., pp. 33-43, 44, 62-64) indicate that there may be serious problems with vegetation and wildlife habitat. Without more information or explanation, the reader cannot possibly assess the adequacy of existing management or any proposed remedies.

18-1

[2/] Further, the categorization system described on pages 8-9 of the DEIS is ambiguous, because inclusion of an allotment in category M or I requires that only one of a number of factors be present. Thus, for example, an allotment on which the composition of desirable vegetative species is significantly improved (factor 1 under Category M characteristics) but on which turnout dates and seasons of use are inconsistent with sound range management (factor 6 under Category I) is apparently could be classified under either Category M or Category I. This ambiguity renders the entire categorization system invalid, because it allows an allotment with serious problems to be placed in Category M, thereby precluding major changes in grazing management on that allotment.

[3/] The DEIS further divides the Category 2 allotments into four priority groups. It fails, however, to give any explanation of the criteria for placement of allotments in the four groups and it fails to state which factor or factors were critical in the selection of each high-priority allotment.

3. The DEIS does not present specific proposals for grazing management.

The United States District Court in HSDC v. Norton wondered that a grazing EIS assess in detail the "specific and particular consequences" of "particular permits or groups of permits." 548 F. Supp. at 838, 841. Obviously such an assessment cannot be made unless specific and particular grazing management proposals have been developed. Such proposals must include numbers of AUM's, seasons-of-use (including turnout dates), and utilization levels for individual allotments or groups of allotments. See 43 C.F.R. 4120.2, 4120.2-1 (1982).

The Divide DEIS, however, presents no specific proposals and is, therefore, inadequate. The "Proposed Action" presented on pages 18-32 is not an "action" at all, but is simply a listing of broad and vague types of actions which may or may not be undertaken at unspecified locations at indefinite times in the future. For example, the draft suggests (p. 18) that, for allotments on which the vegetative resource can be improved, "a grazing management system would be established and adjustments in grazing use and/or stocking levels ... would be made," but no proposals for specific management systems or adjustments on particular allotments are offered. On page 21 it is proposed that, for allotments on which present turnout dates and seasons of use are inconsistent with sound range management principles, "adjustments in turnout dates and/or seasons of use would be made as needed," but the DEIS makes no attempt whatsoever even to estimate what adjustments might be appropriate in specific areas. Similarly, for allotments on which "significant range suitability problems exist" (p. 21), possible types of management actions are listed, but no particular actions are proposed for specific areas.[3/]

18-2

[3/] Appendix 3 contains a table of "potential" management actions which might be implemented on each allotment, but the categories of actions listed in the table are so broad and indefinite that the table is virtually useless. For example, "Grazing Treatments" are prescribed for every allotment in Category I, but the type of treatment (or intensity which type of treatments) would be implemented on each allotment. Similarly, "Change in Season of Use" are indicated for a number of allotments, but there is no hint of the nature or extent of the changes.

The sole exception to the DEIS's lack of specific proposals is the preservation of proposed wild horse population levels in specific areas (footnote continued on next page.)

The problems of the Muddy and Sage Creek drainages have not been well defined at this time. BLM is dealing with multiple ownership in both drainages (see Map 2 of the DEIS). Most of the Sage Creek drainage is in allotments 0603 and 0623, which lack sediment yield data. BLM does not have sufficient data on these drainages and cannot identify specific problems and solutions. BLM specialists believe that monitoring studies will yield the needed information.

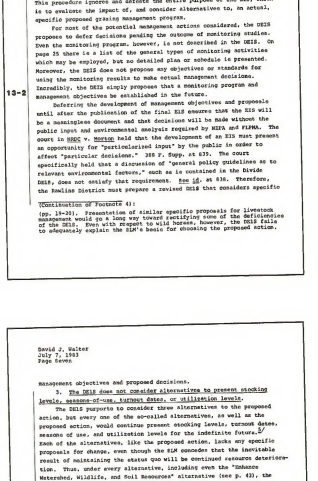
The factors used in the categorization process were based on national policy (IM 82-292 dated March 5, 1983, pages 1-13) and planning criteria and were developed and refined using public input obtained in consultation with permittees and other interested parties.

Additional input was provided through a mailing of the Divide MFP and the Proposed Action and Alternatives to 485 individuals and companies. Further public input was obtained through three public scoping meetings held in the EIS area. The categorization criteria were submitted to and approved by the Wyoming State Office.

Factors for "M" and "I" categorization are parallel and diametrically opposed (see page 9, DEIS) to aflow clear application. Factor 1 for "M" category characteristics says: "The composition of desirable vegetative species on the allotment cannot be significantly improved." Conversely, Factor 1 for the "I" category allotments says: "The composition of desirable vegetative species in the allotment can be improved." The remaining factors maintain the same opposing positions.

The "I" category allotments were placed into priority groups based on the severity of the problems that were identified during the categorization process. Professional judgments of the various problems and priorities were made by BLM personnel based on field observations and district records of resource conditions.

13-2 The "Selective Management" for bureau livestock grazing management prescribed in the bureau's rangeland management policy (Washington Office Instruction Memorandum No. 82-292 dated March 5, 1983) provides a distinct, sequential process for developing a specific grazing



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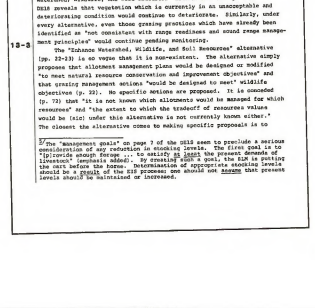
Not only does the DEIS fail to propose a specific grazing management program, it fails even to present the management objectives that such a program would attempt to meet and the specific alternatives that will be considered when decisions are actually made. Instead, it is proposed (p. 18) that planning objectives and proposed management decisions will be developed after the publication of the final EIS. This procedure ignores and defeats the entire purpose of the EIS, which is to evaluate the impact of, and consider alternatives to, an actual, specific proposed grazing management program.

For most of the potential management actions considered, the DEIS proposes to defer decisions pending the outcome of monitoring studies. Even the monitoring program, however, is not described in the DEIS. On page 25 there is a list of the general types of monitoring activities which may be employed, but no detailed plan or schedule is presented. Moreover, the DEIS does not propose any objectives or standards for using the monitoring results to make actual management decisions. Incredibly, the DEIS simply proposes that a monitoring program and management objectives be established in the future.

13-2 Deferring the development of management objectives and proposals until after the publication of the final EIS ensures that the EIS will be a meaningless document and that decisions will be made without the public input and environmental analysis required by NEPA and FLPMA. The court in NRDC v. Morton held that the development of an EIS must present an opportunity for "particularized input" by the public in order to affect "particular decisions." 388 F. Supp. at 837. The court specifically held that a discussion of "general policy guidelines as to relevant environmental factors," such as is contained in the Divide DEIS, does not satisfy that requirement. See id. at 836. Therefore, the Rawlins District must prepare a revised DEIS that considers specific

[Continuation of Footnote 4]:
(pp. 19-20). Presentation of similar specific proposals for livestock management would go a long way toward rectifying some of the deficiencies of the DEIS. Even with respect to wild horses, however, the DEIS fails to adequately explain the BLM's basis for choosing the proposed action.



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management objectives and proposed decisions.

3. The DEIS does not consider alternatives to present stocking levels, seasons-of-use, turnout dates, or utilization levels.

The DEIS purports to consider three alternatives to the proposed action, but every one of the so-called alternatives, as well as the proposed action, would continue present stocking levels, turnout dates, seasons of use, and utilization levels for the indefinite future.[3] Each of the alternatives, like the proposed action, lacks any specific proposals for change, even though the EIS concedes that the inevitable result of maintaining the status quo will be continued resource deterioration. Thus, under every alternative, including even the "Enhance Watershed, Wildlife, and Soil Resources" alternative (see p. 63), the DEIS reveals that vegetation which is currently in an unacceptable and deteriorating condition would continue to deteriorate. Similarly, under every alternative, even those grazing practices which have already been identified as "not consistent with range readiness and sound range management principles" would continue practically unchanged.

13-3 The "Enhance Watershed, Wildlife, and Soil Resources" alternative (pp. 22-23) is no vague that it is non-existent. The alternative simply proposes that allotment management plans would be designed or modified "to meet natural resource conservation and improvement objectives" and that grazing management systems "would be designed to meet" wildlife objectives (p. 22). No specific actions are proposed. It is conceded (p. 73) that "it is not known which allotments would be managed for which resources" and "the extent to which the tradeoff of resources values would be (sic) under this alternative is not currently known either." The closest the alternative comes to making specific proposals is to

[3] The "management goals" on page 3 of the DEIS seem to preclude a serious consideration of any reduction in stocking levels. The first goal is to "[p]rovide enough forage ... to satisfy or meet the present demands of livestock" (emphasis added). By creating such a goal, the BLM is putting the cart before the horse. Determination of appropriate stocking levels should be a result of the EIS process; one should not assume that present levels should be maintained or increased.

management program. Management actions become increasingly specific as more information is gathered.

Selective management will stratify allotments, bringing early attention to those areas with pressing problems and less attention to other allotments where no significant problems exist. In this way, limited range improvement resources can be most effectively utilized.

The Divide EIS proposes a specific grazing management program in the Divide area. This program is the development and implementation of a monitoring program, focusing on the allotments in the "I" category, which will lead to detailed allotment management plans (AMP) and specific range management/improvement actions over a period of time (estimated to be 1 to 20 years). As a part of this proposal, "I" category allotments with more severe problems were identified. Those allotments will receive a higher priority or urgency in the monitoring program. The categorization is based on MFP (land-use planning) recommendations from the Divide/Overland MFP. These recommendations are presented in this EIS for any additional public comment beyond that already generated as part of the normal public involvement in the land use planning process. These land use recommendations will be finalized into decisions after completion of this FEIS. Also, a grazing management program will be adopted for this area after completion of the FEIS. The DEIS identified the proposed grazing management program, noted at the beginning of this paragraph, as the preferred alternative.

Your comment calls for certain specific details of grazing management that are specified in AMPs. AMPs have not been developed for all the allotments in this area. AMP development would be based on specific data gained through monitoring, production inventories where necessary, preliminary range improvement project design, and consultation with operators and other interested parties. The proposed grazing management program would establish a program to develop these AMPs.

13-3 The DEIS considered three alternatives to the grazing managment program. (1) The

suggest that there might be unspecified adjustments in grazing rates or distribution, that livestock might be used seasonally in unspecified areas for vegetative manipulation, and that livestock might be temporarily eliminated from unspecified "specific critical areas."

NEPA requires the serious consideration of genuine alternatives to the continuation of present grazing practices, and the analysis of significantly different levels of livestock use. The BLM's own guidance requires that a grazing EIS analyze a range of grazing levels, including no grazing. See Final Grazing Management Policy, BLM Instruction Memorandum 82-293, at 1-18 (March 3, 1982). The lack of genuine alternatives in the Divide DEIS as well as its failure to address significant reductions in current use, including the "no grazing" alternative, reveals that the Rawlins District has decided, in advance of preparing this EIS and without consideration of environmental impacts, to continue present grazing levels in the Divide Resource Area, in violation of NEPA.

13-3

4. The DEIS does not assess the environmental impact of the proposed action or of any alternatives.

Given that the DEIS contains no specific proposals or detailed alternatives, it is not surprising that it also fails to assess the environmental impact of the non-existent proposal and the non-existent alternatives. Instead, it presents broad, general observations on the sorts of effects that could be obtained from various types of management actions that may or may not be implemented under the proposed action. (See, e.g., pp. 29-41, 47-51, 65-68.) These observations are completely unrelated to any specific proposed actions and to any specific allotments within the EIS area.[5] They are no substitute for the impact analysis this EIS is required to contain.

13-4

The proposed action and every one of the alternatives would continue present levels of grazing for the indefinite future, yet the DEIS makes no attempt to evaluate the impact of continued grazing on soils, vegetation or wildlife. The DEIS states (p. 41) that "situations which are in need of improvement will continue in their presently unacceptable state or may possible decline," but no information is presented on the

[5]On pp. 87-88 the benefits to wildlife of 3-pasture and 4-pasture grazing systems are touted, but such systems are not proposed for implementation in any specific areas at any definite dates.

extent and degree of deterioration that can be expected. The DEIS concedes (p. 83) that the deferral of decisions pending monitoring would lead to continued deterioration of high-priority wildlife habitat, and that the current utilization rates and distribution patterns "are having an adverse impact on the potential of the wildlife community," but no attempt is made to assess the extent of the deterioration or the degree of impact on specific species.

Table F-1 (pp. 4-5) purports to be a summary of the projected environmental consequences of the proposed action and alternatives, but in fact it merely presents the BLM's assumptions that, under the proposed and the alternatives, unspecified and unknown management decisions would be made in the future which would yield the projected results. No analysis is presented to show that the listed effects are indeed likely to be brought about. Further, the categories and the terms used in the table are so broad and undefined that they convey no meaningful information. For example, the entire effect of the proposed action on the condition of vegetation in the 2-million acre EIS area is summarized by a single "+" symbol.[5]

13-4

A similar lack of genuine environmental impact analysis is apparent in the DEIS's treatment of the impact of the proposed action on the availability of forage for wildlife. Instead of attempting to determine whether the proposed action would provide sufficient forage to sustain the game population objectives, the DEIS simply assumes that it will (p. 82).

Table 2-8 (pp. 66-67) presents estimates of the effects on the local economy of changes in grazing AUM's, but the table cannot be used to evaluate the economic impacts of the proposed action or any of the alternatives because the DEIS does not disclose what changes in AUM's would be implemented or would even be possible under any actions considered.

[5]The symbols used in the table are not well-defined. There is no explanation of the criteria for assigning various numbers of "+" symbols such as "++" and "+++."

No Action Alternative is based on a continuation of the present range management program with no change in management. (2) The Enhanced Livestock Alternative would establish a grazing management program where monitoring[1] would identify opportunities to manage for increased livestock use. (3) The Enhanced Watershed, Wildlife and Soil Resources Alternative would establish a grazing management program where monitoring would identify opportunities to manage for increased productivity of watershed, wildlife and soil resources. Under the third alternative, livestock use would be eliminated from areas where such elimination would have a needed, tangible improvement in vegetative condition, as indicated by monitoring. If one of the alternatives were adopted as the final grazing management program, as noted in our response to your second comment, specific details of the chosen alternatives would be developed in AMPs designed to implement that alternative.

With the exception of the No Action Alternative, all alternatives, as well as the Proposed Action, propose definite changes from present management practices, and call for an aggressive monitoring program to develop specific implementation of a grazing management program. The DEIS, therefore, does give serious consideration to genuine alternatives to the continuation of present grazing practices and significantly different levels of livestock use within the vegetative potential in the Divide Resource Area.

You state that BLM policy requires a no grazing alternative. This is not true. The cited policy recommends this alternative, among others, with the alternatives to be ultimately defined by the characteristics of the allotments. A No Grazing Alternative was not presented in this DEIS because such a severe action was not indicated by the vegetative condition. Also, given the landownership patterns in the EIS area (see Map 2 of the DEIS), particularly the "checkerboard" along the Union Pacific Railroad, it would be impracticable to prevent trespass of livestock onto public lands.

[1]Monitoring, as used here, includes production inventories as necessary, other resource information gathering, preliminary range improvement project design, and consultation with operators and other interested parties.

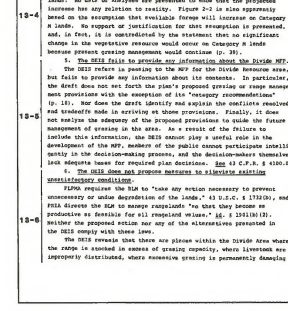

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Figure 2-2 (p. 46), which is labelled "Estimated Long Term Impacts" is based on the assumption that unspecified and unknown management decisions would lead to an increase in available forage on Category I lands. No data or analyses are presented to show that the projected increase has any relation to reality. Figure 2-2 is also apparently based on the assumption that available forage will increase on Category M lands. No support or justification for that assumption is presented, and, in fact, it is contradicted by the statement that no significant change in the vegetative resource would occur on Category M lands because present grazing management would continue (p. 39).

13-4

5. The DEIS fails to provide any information about the Divide MFP.

The DEIS refers in passing to the MFP for the Divide Resource Area, but fails to provide any information about its contents. In particular, the draft does not set forth the plan's proposed grazing or range management provisions with the exception of its "category recommendations" (p. 18). Nor does the draft identify and explain the conflicts resolved and tradeoffs made in arriving at those provisions. Finally, it does not explain the adequacy of the proposed provisions to guide the future management of grazing in the area. As a result of the failure to include this information, the DEIS cannot play a useful role in the development of the MFP, members of the public cannot participate intelligently in the decision-making process, and the decision-makers themselves lack adequate bases for required plan decisions. See 43 C.F.R. § 4100.0-5(g).

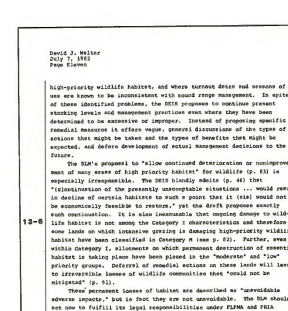
13-5

6. The DEIS does not propose measures to alleviate existing unsatisfactory conditions.

FLPMA requires the BLM to "take any action necessary to prevent unnecessary or undue degradation of the lands." 43 U.S.C. § 1732(b), and FRIA directs the BLM to manage rangelands "so that they become as productive as feasible for all rangeland values." Id. § 1901(b)(3). Neither the proposed action nor any of the alternatives presented in the DEIS comply with these laws.

13-6

The DEIS reveals that there are places within the Divide Area where the range is stocked in excess of grazing capacity, where livestock are improperly distributed, where excessive grazing is permanently damaging



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high-priority wildlife habitat, and where turnout dates and seasons of use are known to be inconsistent with sound range management. In spite of these identified problems, the DEIS proposes to continue present stocking levels and management practices even where they have been determined to be excessive or improper. Instead of proposing specific remedial measures it offers vague, general discussions of the types of actions that might be taken and the types of benefits that might be expected, and defers development of actual management decisions to the future.

The BLM's proposal to "allow continued deterioration or noninprovement of many areas of high priority habitat" for wildlife (p. 83) is especially irresponsible. The DEIS blandly admits (p. 46) that "[d]eterioration of the presently unacceptable situations ... would result in decline of certain habitats to such a point that it (sic) would not be economically feasible to restore," yet the draft proposes exactly such continuation. It is also inexcusable that ongoing damage to wildlife habitat is not among the Category I characteristics and therefore some lands on which intensive grazing is damaging high-priority wildlife habitat have been classified in Category M (see p. 62). Further, even within Category I, allotments on which permanent destruction of essential habitat is taking place have been placed in the "moderate" and "low" priority groups. Deferral of remedial actions on these lands will lead to irreversible losses of wildlife communities that "could not be mitigated" (p. 51).

13-6

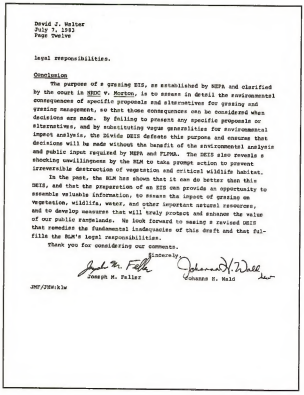
These permanent losses of habitat are described as "unavoidable adverse impacts," but in fact they are not unavoidable. The BLM should not now to fulfill its legal responsibilities under FLPMA and FRIA to protect wildlife. Years of monitoring are not required to identify, for example, riparian areas and aspen stands that are being trampled by excessive concentrations of livestock. Indeed, the DEIS itself recognizes, under the "Enhance Watershed, Wildlife, and Soil Resources" alternative on page 83, that some "problem areas" have already been identified and that the BLM could move more quickly to protect essential habitats than it would under the proposed action. One can only conclude that the BLM is making a conscious and totally unjustified decision to ignore its

13-4 The environmental consequences of each of the four alternatives (including the Proposed Action) are assessed in the DEIS. The specificity of the analysis is limited by the specificity of the proposed grazing management program under each alternative. Limitations of specificity in these alternatives are discussed in our response to your second and third comments. The analysis presented in part two of the DEIS evaluates and compares the environmental consequences of each alternative.

We recognize that the implementation of any of the alternatives is dependent on the rapidity of monitoring to identify specific solutions to problem situations. In those situations where resources have been deteriorating, they would most likely continue to deteriorate until management actions were taken and results were realized. (Results of management actions are often not immediate.) We also recognize, as part of our proposed grazing management program, top priority areas for intense monitoring and management actions are areas where resources have been deteriorating and where there is potential for improvement.

Table S-1 is a comparative summary of areawide impacts. (Detailed analysis is included for each resource and each alternative on pages 39 through 110.) The symbols are not intended to be quantitative or absolute. Pluses (+'s) indicate a degree of increase, minuses (-'s) indicate a degree of decrease. The change is relative and may vary among resources. This is a summation of broad effects and is not intended to be allotment or drainage specific.

Any AUM changes, if necessary, will be identified through monitoring and associated production inventories and other needed studies. The economic analysis presented in the DEIS evaluates our proposed grazing management program and the alternatives. Certain assumptions were necessary to complete this analysis (page 64 of the DEIS). The scenarios analyzed are based on recommended stocking levels for certain ecological classes from the Soil Conservation Service (SCS) Range Site Guidelines. In order to give some indication of the level of magnitude of economic impact from differing levels of



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July 7, 1982
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legal responsibilities.

Conclusion

The purpose of a grazing EIS, as established by NEPA and clarified by the court in NRDC v. Morton, is to assure in detail the environmental consequences of specific proposals and alternatives for grazing and grazing management, so that those consequences can be considered when decisions are made. By failing to present any specific proposals or alternatives, and by substituting vague generalities for environmental impact analysis, the Divide DEIS defeats this purpose and ensures that decisions will be made without the benefit of the environmental analysis and public input required by NEPA and FLPMA. The DEIS also reveals a shocking unwillingness by the BLM to take prompt action to prevent irreversible destruction of vegetation and critical wildlife habitat.

In the past, the BLM has shown that it can do better than this DEIS, and that the preparation of an EIS can provide an opportunity to assemble valuable information, to assess the impact of grazing on vegetation, wildlife, water, and other important natural resources, and to develop measures that will truly protect and enhance the value of our public rangelands. We look forward to seeing a revised DEIS that remedies the fundamental inadequacies of this draft and that fulfills the BLM's legal responsibilities.

Thank you for considering our comments.

Sincerely,

Joseph M. Feller

Johanna H. Wald

JMF/JHW:klw

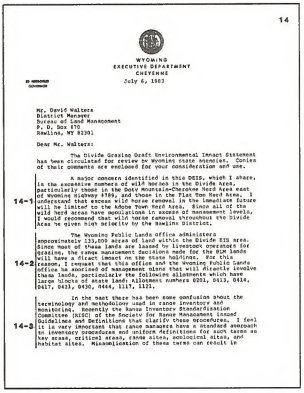
adjustment, we believe that the scenarios used in this section of the EIS provide a range that will help the reader understand the possible economic impacts.

We were in error using the assumption that available forage on "M" category allotments would increase. Since "M" category improvements depend a great deal on operator initiative, the "M" category trend could be the same as that of the "C" category allotments. We do, however, believe that our interpretation of "I" category allotments, which is based on the factors used to characterize the categories, should theoretically follow this pattern.

13-5 The Divide/Overland Management Framework Plan recommendations (MFP 2) include the allotment categorization, proposed management actions, and monitoring plans. It is based on records of historical use, background soil and vegetative surveys, SCS Range Site Guides, consultations with the BLM permittees, other interested parties, and the general public. The Divide EIS Proposed Action follows the MFP recommendations. During the land-use planning phase, no major conflicts were apparent. Although some use conflicts were identified in riparian areas, this only involves less than 3 percent of the Divide area. These problems were not ignored, but it is believed that such conflicts could be more readily resolved during activity planning when more site-specific information is available.

13-6 Apparently the Divide DEIS did not make a conspicuously clear distinction between the amount of land having good to excellent vegetative condition ratings and that which has been subjected to excessive grazing by livestock. BLM does not plan to ignore problem areas and allow vegetative resources to deteriorate indefinitely (page 18, DEIS). The reference to page 46 where "BLM blandly admits..." represents a short-term situation. The statement is a hypothetical case of overgrazing an aspen stand by herbivores (not just cattle), combined with a temporary change in edaphic conditions. Such situations occur infrequently in the EIS area and involve small acreages. The problem alluded to on page 82 is one involving small areas and would not be considered significant enough to place an allotment in an "I" category.

The quotation from page 91 is taken out of context. The previous paragraph refers to "possible commitment of resources."



14

WYOMING
EXECUTIVE DEPARTMENT
CHEYENNE

July 8, 1983

Mr. David Walters
District Manager
Bureau of Land Management
P.O. Box 1869
Rawlins, WY 82301

Dear Mr. Walters:

The Divide Grazing Draft Environmental Impact Statement has been circulated for review by Wyoming state agencies. Copies of their comments are enclosed for your consideration and use.

A major concern identified in this DEIS, which I share, is the possible removal of wild horses in the Divide Area, particularly those in the Doty Mountain-Cherokee Herd Area east of Wyoming Highway #789, and those in the Flat Top Herd Area. I understand that excess wild horse removal in the immediate future will be limited to the Adobe Town Herd Area. Since all of the wild herd areas have populations in excess of management levels, I would request that the Flat Top Herd Area within the Divide Area be given high priority by the Rawlins District.

14-1

The Wyoming Public Lands Office administers approximately 133,000 acres of land within the Divide EIS area. Because of the impact of livestock grazing by livestock processors for grazing, the range management decisions made for the BLM lands will have a direct impact on the state holdings. For this reason, I request that this office and the Wyoming Public Lands Office be apprised of management plans that will directly involve lands in which the state has an interest. Allotments which have large blocks of state land: Allotment numbers 0201, 0413, 0414, 0417, 0421, 0430, 0444, 1117, 1123.

14-2

In the past there has been some confusion about the terminology, methodology, and data collection used in monitoring. Recently the Range Inventory Standardization Committee (RISC) of the Society for Range Management issued Guidelines and Definitions that clarify these procedures. I feel it is very important that range managers have a standard approach to inventory procedures and uniform definitions for such items as key areas, critical areas, range sites, ecological sites, and habitat sites. Misassimilation of these terms can result in

14-3

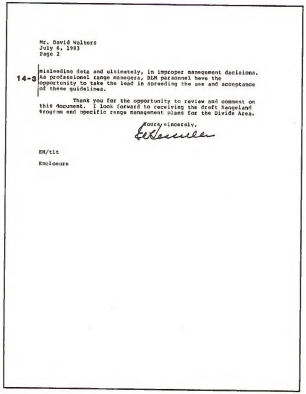
RESPONSES TO LETTER NO. 14

14-1 We must write Herd Management Area Plans (HMAPs) to specific wild horse management actions within any given area. We have not completed HMAPs for the Doty Mountain-Cherokee Herd area or the Flat Top Herd area. We do plan to give high priority to wild horse management (including removal, if necessary) within the Divide EIS area.

14-2 It is BLM policy to consult with affected permittees, lessees, and other rangeland users, intermingled landowners, involved state and federal agencies, etc. in the development and implementation of land-use and grazing management decisions. 43 CFR 4120.2-3(a) concerning development of allotment management plans states:

> An allotment management plan shall be prepared in careful and considered consultation, cooperation and coordination with affected permittee(s) or lessee(s), landowners involved, the district grazing advisory boards where established, any state having lands within the area to be covered by such an allotment management plan and other affected interests...

This office has and will comply with the above mentioned policy and regulation for all grazing allotments and, in particular, the allotments shown below, as you have requested:



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14-5 misleading data and ultimately, in improper management decisions. As professional range managers, BLM personnel have the opportunity to take the lead in spreading the use and acceptance of these guidelines.

Thank you for the opportunity to review and comment on this document. I look forward to receiving the draft Sage/Leaf Program and specific range management plans for the Divide Area.

Sincerely,

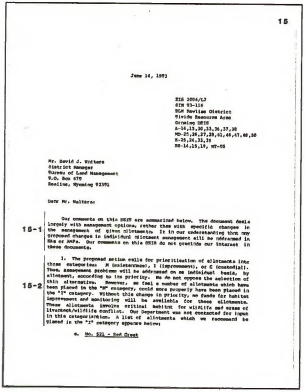
EK/tlt

Enclosure

0201 Buzzard
0413 Dirty Man
0414 Dish
0417 Grizzly
0421 McCarty Canyon
0430 Sage Creek
0444 Truck Drivers Creek
1117 Mexican Meadows
1121 Pioneer Draw

14-3 Throughout the Divide Grazing DEIS and the monitoring effort within the Divide Resource Area, BLM has utilized, to the maximum extent possible, terminology as defined by the Society for Range Management. The primary publication referenced is *A Glossary of Terms Used in Range Management.*

The monitoring methodologies presently practiced within the Divide Resource Area are those approved for bureau-wide use.



15

June 14, 1993

RIN 1004/AJ
RIN 93-119
BLM Rawlins District
Divide Resource Area
Grazing DEIS
2-16,23,30,33,36,37,38
3-2,3,4,5,7,8,27,29,41,45,47,48,58
4-20,28,29,30,31
88-12,13,15, WY-93

Mr. David J. Walters
Acting Art Manager
Bureau of Land Management
P.O. Box 670
Rawlins, Wyoming 82301

Dear Mr. Walters:

15-1 Our comments on this DEIS are summarized below. The document deals largely with management options, rather than with specific changes in the management of given allotments. Thus, the most substantive form any proposed changes in individual allotment management will be addressed in EAs or AMPs. Our comments on this DEIS do not question our interest in these documents.

15-2 1. The proposed action calls for prioritization of allotments into three categories: M (maintenance), I (improvement), or C (custodial). Then, management problems will be addressed on an individual basis, by allotment, according to its priority. We do not oppose the selection of this alternative. However, we feel a number of allotments which have been placed in the "M" category, and some in the "I" category have been placed in the "C" category. Without this change in priority, no funds for habitat improvement and monitoring will be available for these allotments. These allotments involve critical habitat for wildlife and areas of livestock/wildlife conflict. Our Department was not consulted for input in this categorization. A list of allotments which we recommend be placed in the "I" category appears below:

a. Dec. Bill - Red Draw

RESPONSES TO LETTER NO. 15

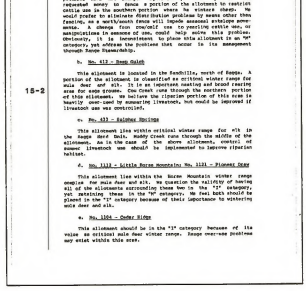
15-1 Yes, any proposed changes in individual allotment management will be addressed in EAs on AMPs.

15-2 The issues described by the Wyoming Game and Fish Department (WGFD) were considered in the categorization of the allotments. The bureau placed these allotments in the "M" category, based on the best information available and through the consultation process.

The WGFD was provided the opportunity to review and comment on the MFP recommendations, which included the categorization of each allotment.

Our data indicates that over 90 percent of the Divide area big game critical winter ranges are in good condition. Critical winter range designation was not a categorization criteria.

15-3 Any new fencing and riparian rehabilitation will be addressed in activity plans with



Mr. David J. Walters
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This allotment is part of a livestock operation currently under consideration in the Range Reserve/Habitat Program. This allotment is a common use allotment, shared by 4 different operators. Cattle are on the allotment approximately 5 months, from mid-May to mid-October and sheep use is concentrated in the southern portion. Some water has been developed in the northern portion, but livestock use patterns have not changed significantly. One operator has requested sweep to fence a portion of the allotment to restrict sheep use to the southern portion. Although this operator feels he would prefer to alleviate distribution problems by means other than fencing, as a north/south fence will impede seasonal antelope movements. A change from one/self use to yearling cattle use, or manipulations in seasons of use, could help solve this problem. Obviously, it is inconvenient to place title allotment in an "M" category, yet address the problems that occur in its management through Range Stewardship.

b. No. 419 - Sweep Habitat

This allotment is located in the Foothills, north of Sweps. A portion of the allotment is classified as critical winter range for mule deer and elk. It is an important roosting and brood rearing area for sage grouse. Cow Creek runs through the northern portion of this allotment. We believe the riparian portion of this area is heavily over-used by summering livestock, but could be improved if livestock use was controlled.

c. No. 433 - Spidney Springs

This allotment lies within critical winter range for elk in the Foothills. We believe the riparian portion of this allotment, in the vicinity of the Spidney Springs, could be improved. Control of summer livestock use should be implemented to improve riparian habitat.

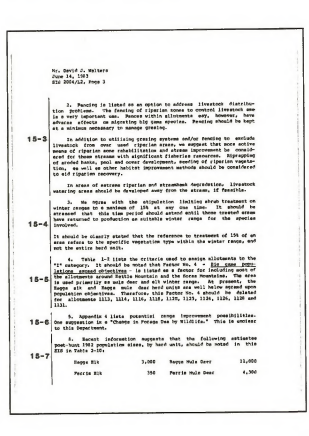
d. No. 1113 - Little Horse Mountain No. 1131 - Pioneer Draw

This allotment lies within the Horse Mountain winter range complex for mule deer and elk. We question the validity of having all of the allotments surrounding these two in the "I" category, yet patenting these in the "M" category. We feel both should be placed in the "I" category because of their importance to wintering mule deer and elk.

e. No. 1104 - Cedar Ridge

This allotment should be in the "I" category because of its value as critical mule deer winter range. Sheep over-use problems may exist within this area.

15-2



Mr. David J. Walters
June 14, 1983
BIH 8004/LS, Page 3

2. Fencing is listed as an option to address livestock distribution problems. The fencing of riparian zones to control livestock use is a very important use. Fences within allotments are, however, have adverse effects on migrating big game species. Fencing should be kept at a minimum necessary to manage grazing.

15-3

In addition to utilizing grazing systems and/or fencing to exclude livestock from near used riparian areas, we suggest that water developments of riparian zone rehabilitation and streambank protection be considered as a means of improving riparian habitat where it is deteriorated. Appropriate use of piped fences, pool and corral development, rewatering of riparian vegetation, as well as other habitat improvement methods should be considered to aid riparian recovery.

In areas of extreme riparian and streambank degradation, livestock watering areas should be developed away from the stream, if feasible.

3. We agree with the stipulation limiting shrub treatment on winter ranges to a maximum of 15% at any one time. It should be stressed that this time period should extend until these areas have been returned to production as suitable winter range for the species involved.

15-4

It should be clearly stated that the reference to treatment of 15% of an area refers to the specific vegetative type within the winter range, and not the entire herd unit.

4. Table I-3 lists the criteria used to assign allotments to the "I" category. It should be noted that Factor No. 4 - Big game population around allotments - is listed as a factor for including the allotments around Saddle Mountain and Horse Mountain. The rest of the allotments are within designated winter range. At present, the Sweps elk and Sweps mule deer herd units are well below agreed upon population objectives. Therefore, this Factor No. 4 should be deleted for allotments 1113, 1114, 1116, 1118, 1119, 1124, 1128, 1130 and 1131.

15-5

5. Appendix 4 lists potential range improvement possibilities. One suggestion is a "Change in Forage Use by Wildlife." This is unclear to this Department.

15-6

6. Sunset information suggests that the following estimates post-hunt 1982 population sizes, by herd unit, should be noted in this EIS in Table 2-10:

15-7

Sweps Elk	3,000	Sweps Mule Deer	11,000
Perrin Elk	350	Perrin Mule Deer	4,300

greater detail in project specific EAs. Your input to that process and the stewardship program will continue to be welcome and will be considered by the BLM.

15-4 No more than 15 percent of a particular winter range would be treated at one time. Time periods between treatments would depend on site-by-site evaluations of vegetative type use and animal distributions. Project design and implementation would be coordinated with Game and Fish personnel.

15-5 Based on recent information supplied by the WGFD, we recognize that the existing elk and mule deer populations are not exceeding the herd unit objectives. However, during the consultation process with the livestock operators, forage competition between livestock and big game was identified as possibly affecting allotment forage condition, production and use. Therefore, this factor was included as a concern in Table 1-2.

15-6 This term refers to either a shift in population distribution and/or a change in numbers that would lead to a "change in forage use by wildlife." Any change in wildlife populations would have to be recommended to the WGFD.

15-7 Table 2-10 has been changed to reflect these population estimates.

15-8 The only mitigation measures included in this document are those that would lessen or offset impacts resulting from implementation of the Proposed Action or one of the alternatives. Your comments are appreciated and will be used to help decide those areas where we most urgently need to develop activity plans. The mitigation measures outlined in the Water Resources section will be applied to degraded portions of Sage and Muddy Creek drainages, as additional data is gained from monitoring and activity plans. We welcome further identification of specific areas in the "M" and "C" category allotments that you believe have habitat or water resource problems directly related and attributable to livestock grazing.

15-9 The nongame fish species mentioned are present in parts of Muddy Creek; roundtail and flannelmouth sucker are present in Littlefield Creek, a tributary of Muddy

TABLE 2-10

BIG GAME POPULATIONS, ACRES OF SEASONAL RANGES, AND ACRES OF SEASONAL RANGES DISTURBED[1]

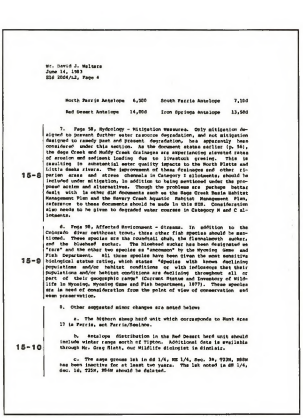
Species	Herd Unit	Current Population[2]	Population Objective[2]	Acres of Seasonal Range							
				Summer	Acres Disturbed	Winter	Acres Disturbed	Winter/ Yearlong	Acres Disturbed	Crucial Winter	Acres Disturbed
Bighorn Sheep	Ferris	No estimate	150	7,700	0	2,960	2	37,000	0	3,000	26
Elk	Ferris	350	350	11,084	0	90,083	48	100,213	55	0	0
	Shamrock Hills	60	None	0	0	0	0	50,650	455	0	0
	Baggs	3,000	4,200	12,177	18	53,670	91	38,621	265	108,660	458
Mule Deer	Ferris	4,300	5,000	27,800	0	23,300	127	254,596	426	33,250	12
	Chain Lakes	200	200	0	0	0	0	172,973	1,175	0	0
	Table Rock	—	[3]	24,200	350	0	0	0	0	0	0
	Black Butte	250	[3]	0	0	0	0	101,837	18	0	0
	South Wamsutter	2,211	2,700	0	0	0	0	834,284	9,128	79,994	405
	Baggs	11,000	13,000	273,379	1,059	0	0	392,350	2,775	148,551	724
	Platte River	1,250	[3]	120,824	477	0	0	229,358	559	35,489	132
White-tailed Deer[4]	Ferris	No estimate	None	—		—		—		—	
	Baggs	No estimate	None	—		—		—		—	
	Platte River	No estimate	None	—		—		—		—	
Pronghorn	North Ferris	6,500	3,500	130,900	149	0	0	71,150	30	0	0
	South Ferris	7,100	4,200	148,714	475	0	0	151,876	1,440	93,055	822
	Red Desert	14,000	10,000	829,009	6,388	0	0	439,293	3,924	105,442	320
	Black Butte	470	[3]	0	0	0	0	101,837	18	0	0
	South Wamsutter	6,988	7,000	14,482	162	0	0	828,939	9,012	85,339	503
	Baggs	11,085	7,200	173,056	421	0	0	315,017	3,001	79,986	717
	Iron Springs	13,500	[3]	318,167	826	0	0	226,842	759	0	0

[1]Current areas disturbed by oil and gas development.

[2]Current population and population objectives are the post-harvest estimates.

[3]Only a small percentage of the herd unit is within the EIS area, therefore, population objectives are not included.

[4]White-tailed deer are known to inhabit portions of these herd units. No population or seasonal range information data is available.



Mr. David J. Waltare
June 11, 1981
BLM 2804/All, Page 4

North Parria Antelope	6,300	South Parria Antelope	7,350
Red Desert Antelope	14,950	Iron Springs Antelope	13,580

7. Page 58, Hydrology - Mitigation Measures. Only mitigation designed to prevent further water resource degradation, and not mitigation designed to restore lost water resources, should be considered under this section. As the documents stands section (g, 58), the Sage Creek and Muddy Creek drainages are experiencing elevated rates of erosion and sediment loading due to livestock grazing. This is resulting in substantial water quality impacts to the Bucks Flatts and Red Desert Basin. The mitigation measures, such as exclosures, to prevent access and stream channels in Category I allotments, should be included under mitigation, in addition to being mentioned under the proposed action and alternatives. Though the problems are perhaps better dealt with in other BLM documents such as the Sage Creek Basin Habitat Management Plan and the Muddy Creek Aquatic Habitat Management Plan, reference to these documents should be made in this EIS. Consideration should also be given to degraded water courses in Category B and C allotments.

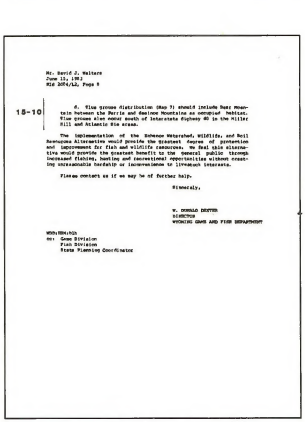
8. Page 58, Affected Environment - Grasses. In addition to the Crested Wheat northeast towns, these other flat species should be mentioned: Sandberg's bluegrass, Indian ricegrass, and Thurber needlegrass are of the bluebunch cenker. The bluebunch cenker has been designated as "rare" and the other two species as "uncommon" by the Wyoming Game and Fish Department. All these species have been given the most sensitive ecological status rating, which states "Species with known dwelling populations and/or habitat conditions are declining throughout all or part of their geographic range" (Current Status and Inventory of Wildlife in Wyoming, Wyoming Game and Fish Department, 1977). These species are in need of consideration from the point of view of conservation and some preservation.

9. Other suggested minor changes are noted below:

a. The Bighorn sheep herd unit which corresponds to Hunt Area 17 is Parria, not Parria/Ramsden.

b. Antelope distribution in the Red Desert herd unit should include winter range north of Tipton. Additional data is available through Mr. Greg Hiatt, our Wildlife Biologist in Rimrock.

c. The sage grouse lek in SE 1/4, NE 1/4, Sec. 34, T23N, R98W has been inactive for at least two years. The lek noted in NE 1/4, Sec. 16, T22N, R96W should be deleted.



Mr. David J. Waltare
June 11, 1981
BLM 2804/All, Page 5

6. Elk groups distribution (Map 7) should include Bear Mountain between the Parria and Ramsden Mountains as somewhat habitat. Elk groups also occur south of Interstate Highway 80 in the Miller Hill and Atlantic Rim areas.

The implementation of the Sonoran Watershed, Wildlife, and Soil Resources Alternative would provide the greatest degree of protection and improvement for fish and wildlife resources. No Coal mine alternative would provide the greatest benefit to the general public through increased fishing, hunting and recreational opportunities without creating unreasonable hardship or inconvenience to livestock interests.

Please contact us if we may be of further help.

Sincerely,

W. DONALD DEXTER
DIRECTOR
WYOMING GAME AND FISH DEPARTMENT

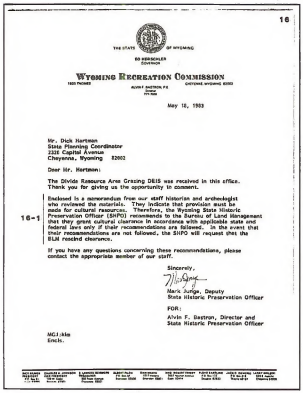
WDD:EBH:jhb
cc: Game Division
Fish Division
Trans Planning Coordinator

18-6 18-8 18-10 18-10

Creek. We agree that these species should be mentioned, and page 98 of the DEIS has been changed to reflect this.

The lack of information on the habitat requirements of these species makes it difficult to manage the habitat for them. In order to develop appropriate management actions in the Muddy Creek drainage, we will need your assistance in determining the needs of these particular species.

15-10 The text has been changed on pages 75 and 76 to reflect the suggested changes a, b, c, and d. We acknowledge and appreciate your corrections of the maps, and we will amend our planning maps accordingly.



16

THE STATE OF WYOMING

ED HERSCHLER
GOVERNOR

WYOMING RECREATION COMMISSION

1920 THOMAS — ALVIN F. BASTRON, P.E. Director — CHEYENNE, WYOMING 82002

May 15, 1985

Mr. Dick Hartman
State Planning Coordinator
122E Capitol Avenue
Cheyenne, Wyoming 82002

Dear Mr. Hartman:

The Divide Resource Area Grazing DEIS was received in this office. Thank you for giving us the opportunity to comment.

16-1 Enclosed is a memorandum from our staff historian and archeologist who reviewed the materials. They indicate that provision must be made for cultural resources. Therefore, the Wyoming State Historic Preservation Officer (SHPO) recommends to the Bureau of Land Management that they grant cultural clearance in accordance with applicable state and federal laws only if their recommendations are followed. In the event that their recommendations are not followed, the SHPO will request that the BLM rescind clearance.

If you have any questions concerning these recommendations, please contact the appropriate member of our staff.

Sincerely,

Mark Junge, Deputy
State Historic Preservation Officer

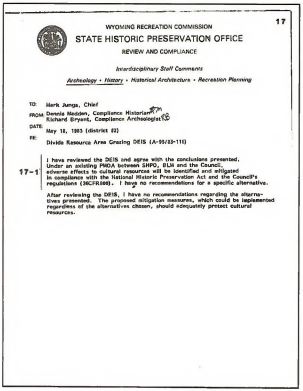
FOR:

Alvin F. Bastron, Director and
State Historic Preservation Officer

MCJ:klo
Encls.

RESPONSE TO LETTER NO. 16

The Programmatic Memorandum of Agreement between the Department of the Interior, Bureau of Land Management; the Advisory Council on Historic Preservation; and the National Conference of State Historic Preservation Officers regarding the Livestock Grazing and Range Improvement Program dated January 14, 1980, will be implemented in the Divide EIS area.



17

WYOMING RECREATION COMMISSION

STATE HISTORIC PRESERVATION OFFICE

REVIEW AND COMPLIANCE

Interdisciplinary Staff Comments

Archeology • History • Historical Architecture • Recreation Planning

TO: Mark Junge, Chief

FROM: Dennis Madden, Compliance Historian
Richard Bryant, Compliance Archeologist

DATE: May 15, 1985 (district #2)

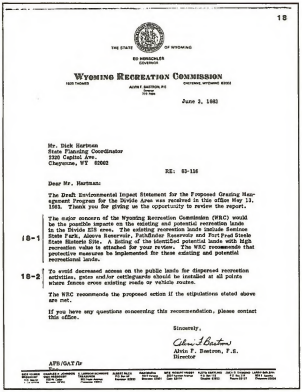
RE: Divide Resource Area Grazing DEIS (A-95/83-111)

17-1 I have reviewed the DEIS and agree with the conclusions presented. Under an existing PMOA between SHPO, BLM and the Council, adverse effects to cultural resources will be identified and mitigated in compliance with the National Historic Preservation Act and the Council's regulations (36CFR800). I have no recommendations for a specific alternative.

After reviewing the DEIS, I have no recommendations regarding the alternatives considered. The proposed mitigation measures, which could be implemented regardless of the alternative chosen, should adequately protect cultural resources.

RESPONSE TO LETTER NO. 17

Thank you for your comments.



18

THE STATE OF WYOMING

GO BOROUGHS
GOVERNOR

WYOMING RECREATION COMMISSION

1920 THOMAS AVENUE, P.O. BOX 309, CHEYENNE, WYOMING 82003

June 2, 1982

Mr. Dick Hartman
State Planning Coordinator
3320 Capitol Ave.
Cheyenne, WY 82002

RE: 83-116

Dear Mr. Hartman:

The Draft Environmental Impact Statement for the Proposed Grazing Management Program for the Divide Area was received in this office May 13, 1982. Thank you for giving us the opportunity to review the report.

18-1 The major concern of the Wyoming Recreation Commission (WRC) would be the possible impacts on the existing and potential recreation lands in the Divide EIS area. The existing recreation lands include Seminoe State Park, Alcova Reservoir, Pathfinder Reservoir and Fort Fred Steele State Historic Site. A listing of the identified potential lands with high recreation value is attached for your review. The WRC recommends that adequate buffers be implemented for these existing and potential recreational lands.

18-2 To avoid decreased access on the public lands for dispersed recreation activities, gates and/or cattleguards should be installed at all points where fences cross existing roads or vehicle routes.

The WRC recommends the proposed action if the stipulations stated above are met.

If you have any questions concerning this recommendation, please contact this office.

Sincerely,

Alvin F. Beetron

Alvin F. Beetron, P.E.
Director

AFB/GAT/fr

cc:

POTENTIAL RECREATION LANDS

CARBON COUNTY

T	R	Section	Acres	Site Name	Ownership
26N	84W	18	640	Seminoe Reservoir	Federal
26N	85W	1	640	Seminoe Reservoir	Federal
25N	84W	25	640	Seminoe Reservoir	Federal
25N	84W	27	640	Seminoe Reservoir	Federal
25N	84W	34	640	Seminoe Reservoir	Federal
26N	84W	22	640	Miracle Mile	Federal
26N	84W	27	256	Miracle Mile	Federal
26N	84W	34	156	Miracle Mile	Federal
24N	81W	34	640	Medicine Bow River	Federal
24N	82W	22	640	Medicine Bow River	Federal
24N	86W	20	640	Rear Mud Mountains	Federal

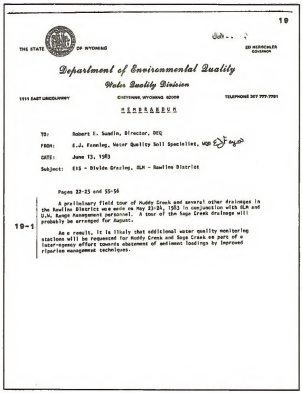
NOTICE:

This listing is NOT complete. Additional sites will be added after on-site field evaluations have been evaluated.

RESPONSES TO LETTER NO. 18

18-1 Our initial analysis determined that none of the lands you list as "potential recreational lands" would be affected by the Proposed Action or any of the alternatives. Therefore, none of these lands was included in the Affected Environment section or addressed in the DEIS, and no special protection measures were determined to be necessary.

18-2 It is bureau policy to place cattleguards and/or gates at all points where fences would cross roads. The only exception to this policy would be the isolated case where a road was determined not to be needed for recreational or general access purposes.



19

THE STATE OF WYOMING — ED HERSCHLER GOVERNOR

Department of Environmental Quality

Water Quality Division

1111 EAST LINCOLNWAY — CHEYENNE, WYOMING 82002 — TELEPHONE 307 777-7781

MEMORANDUM

TO: Robert E. Sundin, Director, DEQ

FROM: E.J. Fameley, Water Quality Soil Specialist, WQD

DATE: June 13, 1983

Subject: EIS - Divide Grazing, BLM - Rawlins District

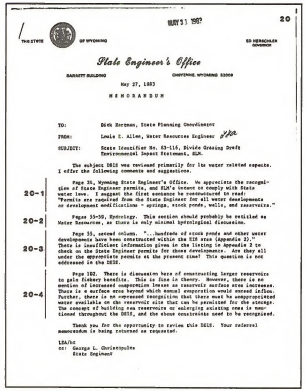
Pages 22-23 and 55-56

19-1 A preliminary field tour of Muddy Creek and several other drainages in the Rawlins District was made on May 23-25, 1983 in conjunction with BLM and SCS, Range Management personnel. A tour of the Sage Creek drainage will probably be arranged for August.

As a result, it is likely that additional water quality monitoring stations will be requested for Muddy Creek and Sage Creek as part of a inter-agency effort towards abatement of sediment loadings by improved riparian management techniques.

RESPONSE TO LETTER NO. 19

The Rawlins District is willing to cooperate in providing sites for additional water quality monitoring stations to obtain additional water quality data regarding sediment abatement in the Muddy Creek and Sage Creek drainages.



MAY 31 1983

20

THE STATE OF WYOMING — ED HERSCHLER GOVERNOR

State Engineer's Office

BARRETT BUILDING — CHEYENNE, WYOMING 82002

May 27, 1983

MEMORANDUM

TO: Dick Dorman, State Planning Coordinator

FROM: Lewis E. Allen, Water Resources Engineer

SUBJECT: State Identifier No. 83-116, Divide Grazing Draft Environmental Impact Statement, BLM.

The subject DEIS was reviewed primarily for its water related aspects. I offer the following comments and suggestions.

20-1 Page 24, Wyoming State Engineer's Office. We appreciate the recognition of State Engineer permits, and BLM's intent to comply with State water laws. I suggest the first sentence be reconstructed to read: "Permits are required from the State Engineer for all water developments or development modifications - springs, stock ponds, wells, and reservoirs."

20-2 Pages 54-55, Hydrology. This section should probably be retitled as Water Resources, as there is only minimal hydrological discussion.

20-3 Page 55, second column. "...hundreds of stock ponds and other water developments have been constructed within the EIS area (Appendix 2)." There is insufficient information given in the listing in Appendix 2 to check on the State Engineer permits for these developments. Are they all under the appropriate permits at the present time? This question is not addressed in the DEIS.

20-4 Page 102. There is discussion here of constructing larger reservoirs to gain fishery benefits. This is fine in theory. However, there is an question of increased evaporation losses as reservoir surface area increases. There is a surface area beyond which annual evaporation would exceed inflow. Further, there is an unstated recognition that there must be unappropriated water available for the reservoir site that can be stored. Before we encourage the concept of building new reservoirs or enlarging existing ones to maximize fishery throughout the DEIS, and the issue constraints need to be recognized.

Thank you for the opportunity to review this DEIS. Your referral memorandum is being returned as requested.

LEA/hc

cc: George L. Christopulos
State Engineer

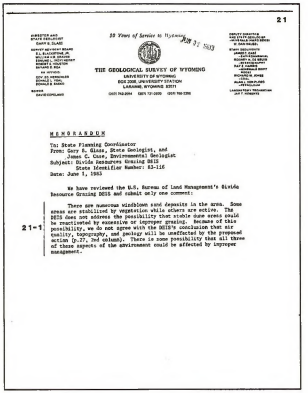
RESPONSES TO LETTER NO. 20

20-1 We agree, page 24 of the text has been changed to reflect this.

20-2 We agree, page 55 of the text has been changed to reflect this.

20-3 Under the new range improvement policy, reservoirs are being inventoried and their status is being clarified. BLM will apply for appropriate permits where they are lacking.

20-4 We agree with your observations. The construction of larger reservoirs to benefit fisheries would require the availability of unappropriated water and would require a state permit. Such reservoir projects would not be undertaken unless a minimum pool of adequate surface area and depth could be created. These reservoirs would not be "overbuilt" so as to cause unnecessary water loss through evaporation.



21

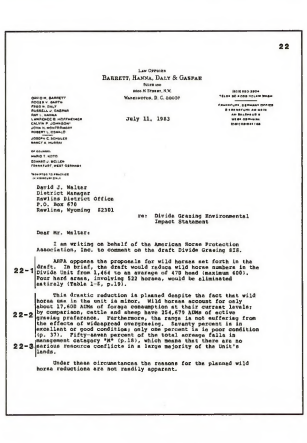
21-1

MEMORANDUM

To: State Planning Coordinator
From: Dave Walter, Wildlife Ecologist, and
Bruce C. Hoke, Environmental Geologist
Subject: Divide Resources Grazing EIS
State Identifier Number: 83-116
Date: June 1, 1983

We have reviewed the U.S. Bureau of Land Management's Divide Resource Grazing DEIS and submit only one comment:

There are numerous windblown sand deposits in the area. Some areas are stabilized by vegetation while others are active. The DEIS does not address the possibility that stable dune areas could be reactivated by excessive or improper grazing. Because of this possibility, we do not agree with the DEIS's conclusion that wildlife habitat resources will be "slightly improved" over the proposed action (p.27, 2nd volume). There is some possibility that all three of these aspects of the environment could be affected by improper management.



22

22-1

22-2

22-3

RESPONSE TO LETTER NO. 21

Present livestock grazing management practices within areas of stabilized sand dunes are not considered so excessive or improper as to cause "activation" of the dunes. Most of the management practices have been in existence for several years and have not severely impacted the vegetation that is vital to the dune stabilization process. Specific management actions would be developed through monitoring, additional studies and consultation. Where stable sand dunes occur in an allotment, reactivation of stable dunes is an important concern in considering management actions.

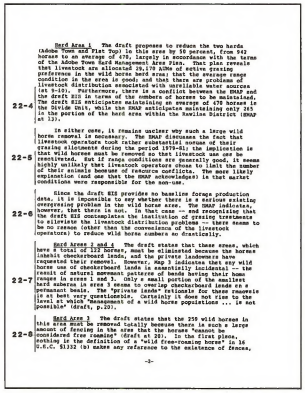
RESPONSES TO LETTER NO. 22

22-1 Refer to letter 4, response 1.

22-2 Wild horse use accounts for an estimated 20,270 Animal Unit Months (AUMs) of forage consumed annually. Scattered areas exist that show signs of resource deterioration because of excessive horse use. These areas are generally small and usually associated with water resources.

The proposed wild horse numbers are suggested to help alleviate these more isolated grazing problems and are not aimed at reducing "widespread overgrazing." Within the Divide EIS area, widespread overgrazing is not a problem and is not a reason for the proposed population levels.

22-3 Fifty-seven percent of the total acreage falls in management category "M." However, wild horse concentrations are localized. For example, 85 percent of the acreage of the allotments that fall within the areas identified as wild horse concentration areas have been placed in manage-



Herd Area 1 The draft proposes to reduce the two herds (Adobe Town and Flat Top) in this area by 50 percent, from 842 horses to an average of 479, largely in accordance with the terms of the Adobe Town Herd Management Area Plan. That plan reveals that livestock are allocated 29,170 AUMs of active grazing preference in the area. It also indicates that the average range condition in the area is poor, and that the problems of livestock distribution associated with unreliable water sources (at 9-10). Furthermore, there is a conflict between the RMAP and the draft EIS in terms of the numbers of horses to be maintained. The draft EIS anticipates maintaining an average of 479 horses in the 58B Unit, while the RMAP anticipates maintaining only 285 in the portion of the herd area within the Rawlins District (RMAP at 12).

22-4

In either case, it remains unclear why such a large wild horse removal is necessary. The RMAP discusses the fact that livestock operators have voluntarily reduced their active grazing allotments during the period 1976-81; the implication is that wild horses must be removed so that livestock use can be reactivated. But if range conditions are generally good, it seems highly unlikely that livestock operators chose to limit the number of livestock they were allowed to graze on the ranges. The more likely explanation (and one that the RMAP acknowledges) is that market conditions were responsible for the non-use.

22-5

Since the draft EIS provides no baseline forage production data, it is impossible to judge whether there is a significant overgrazing problem in the Wild Horse area. The RMAP indicates, however, that there is not. In that case -- and recognizing that the draft EIS contemplates the institution of grazing treatments to eliminate the livestock distribution problems -- there seems to be no reason to order them the convenience of the livestock operators) to reduce wild horse numbers so drastically.

22-6

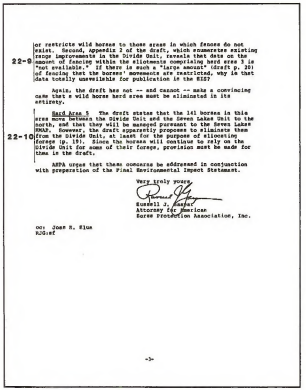
Herd Areas 2 and 4 The draft EIS states that these areas, which have a total of 127 horses, must be eliminated because the horses "cannot be considered free roaming" since private landowners have requested their removal. The draft EIS indicates that any wild horse use of checkerboard lands is accidental, and that as the result of natural movement patterns of herds having their home ranges in areas 1 and 3. (Only a small portion of the smallest herd address in area 3 seems to overlap checkerboard lands as a permanent basis. The "private lands" rationale for these removals is a new one, and apparently has arisen since 1980 (the time at the level at which "management of a wild horse population ... is not possible" (draft, p.23).

22-7

Herd Area 3 The draft states that the 250 wild horses in this area must be removed totally because there is a very large amount of fencing in the area that the horses "cannot be considered free roaming" (draft at 22). In the first place, nothing in the definition of a "wild free-roaming horse" in 16 U.S.C. §1332 (b) makes any reference to the existence of fences,

22-8

-2-



or restricts wild horses to those areas in which fences do not exist. Second, Appendix 3 of the draft, which enumerates existing range improvements within the Herd Area, indicates that only 3 miles of fencing within the allotments comprising herd area 3 is "not available." If there is presently only 3 miles of fencing that the horses' movements are restricted, why is that data totally unavailable for publication in the EIS?

22-9

Again, the draft has not -- and cannot -- make a convincing case that a wild horse herd area must be eliminated in its entirety.

Herd Area 5 The draft states that the 141 horses in this area must be removed because they have access to the Green Lakes Unit to the north, and that they will be managed pursuant to the Green Lakes RMAP. However, the draft apparently proposes to eliminate them from the Divide Unit, at least for the purpose of eliminating forage (p. 19). Since the horses will continue to rely on the Divide Unit for some of their forage, provision must be made for them in the draft.

22-10

ARPA urges that these concerns be addressed in conjunction with preparation of the Final Environmental Impact Statement.

Very truly yours,

Kendall T. Carter
Attorney for American
Horse Protection Association, Inc.

cc: Joan B. Blum
KJC:ef

-3-

ment category "I." This appears to indicate that within the wild horse concentration areas, resource problem(s) exist. We believe that with proper management, these problems can be resolved.

22-4 A herd management area plan (HMAP) has been developed for the Adobe Town area, of which a portion lies within the Rock Springs and Rawlins portions of the Adobe Town HMAP.

22-5 Livestock market conditions have been a contributing factor to the substantial amount of nonuse taken in the past few years. But, market conditions alone have not dictated the taking of nonuse; forage availability and range condition have also been factors. Most livestock operators realize that if the range is overutilized, its production will decline. Nonuse has been taken to avoid overgrazing the range as well as for economic conditions.

22-6 Livestock distribution problems can usually be corrected with proper grazing treatments. Resource conflicts involving wild horses are not as easily rectified. As mentioned earlier, wild horses cannot be herded to graze different areas after one area has received proper utilization. They remain in the area if water is available and they are not disturbed, causing deterioration to the vegetation and possibly damaging soil resources. The optimum number of horses to be managed, as specified in the DEIS, was determined by utilizing the best available data, public input, and knowledge of wild horses' habits and characteristics. Managing horse numbers at the specified levels should provide for sound resource management, while maintaining a viable wild horse population within the EIS area.

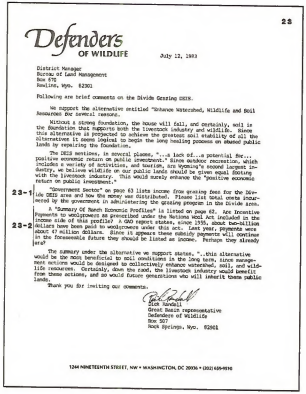
22-7 Maintaining a wild horse herd on federal land adjacent to the checkerboard will allow continued drift and movement of wild horses onto the checkerboard lands. Conflicts resulting from wild horses on private land have led to numerous verbal and written requests from private landowners to remove horses from their lands. According to federal regulation 43 CFR 4750.3, BLM shall make the necessary arrangements for wild horse removal upon request from the private landowner.

The authorized officer shall remove, as soon as he can make the necessary arrangements, wild free-roaming horses and burros, from private land at the request of the landowner where the private land is enclosed in a "legal fence." A "legal fence" for this purpose is one which complies with State standards and specifications. In "no fence districts" or other areas where the private landowner is not required by State statute to fence the private land to protect it from trespass by domestic livestock, the authorized officer shall, as soon as he can make the necessary arrangements, remove wild free-roaming horses or burros from such private land at the request of the landowner.

22-8 See letter 4, response 2.

22-9 Our information indicates that there is an extensive network of fences on the large amount of private and state land occurring in Area 3. A complete and accurate inventory of fences in this area is currently being conducted.

22-10 The Seven Lakes HMAP describes how the wild horses will be managed within the Seven Lakes planning unit, which is the area north of the checkerboard lands and west of highway 287. As stated in federal regulation CFR 43 4750.3, horses must be removed from private land upon request from the landowner. Removing horses from the checkerboard in the Divide EIS area will still leave a viable wild horse herd in the Seven Lakes unit. Since there is ample forage available for horses in the Seven Lakes unit, removing horses from the private land will not eliminate horses from the Seven Lakes area.



23

Defenders
OF WILDLIFE

July 12, 1983

District Manager
Bureau of Land Management
Box 670
Rawlins, Wyo. 82301

Following are brief comments on the Divide Grazing EIS.

We support the alternative entitled "Advance Watershed, Wildlife and Soil Association for several reasons.

Without a strong foundation, the house will fall, and certainly, soil is the foundation that supports both the livestock industry and wildlife. Since this alternative is projected to achieve the greatest soil stability of all the alternatives it seems logical to begin the long healing process on stressed public lands by repairing the foundation.

The DEIS mentions, in several places, "...a lack of...a potential for..." possible increased benefits from this alternative. Because this alternative includes a variety of activities, and hopefully, any opening's opposition, as we do, we believe wildlife on our public lands should be given equal footing with the livestock industry. This would surely enhance the "positive economic return on public investment."

23-1 "Government Sector" on page 43 lists income from grazing fees for the Divide EIS area and how the money was distributed. Please list total costs incurred by the government in administering the grazing program in the Divide area.

"Summary of Ranch Economic Profiles" is listed on page 62. Are Incentive Payments for Conservation Practices under the Agricultural Act of 1980 included in the income side of this profile? A GAO report states, since 1936 more than two-billion
23-2 dollars have been paid to workgroups under this act. Last year, 1982, approximately 47 million dollars. Since it appears these subsidy payments will continue in the foreseeable future they should be listed as income. Perhaps they already are?

The summary under the alternative we support states, "...this alternative would be more responsive to the public interest in the long term, since management actions would be designed to collectively enhance watershed, soil, and wildlife resources. Certainly, down the road, the livestock industry would benefit from these actions, and so would future generations who will inherit these public lands.

Thank you for inviting our comments.

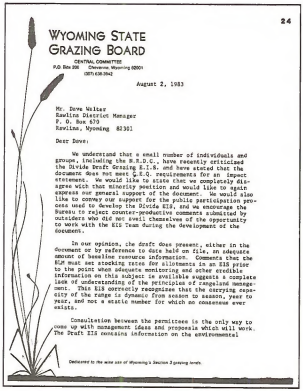
Dick Randall
Great Basin representative
Defenders of Wildlife
Box 327
Rock Springs, Wyo. 82901

1244 NINETEENTH STREET, NW • WASHINGTON, DC 20036 • (202) 659-9510

RESPONSES TO LETTER NO. 23

The cost of administering the grazing program in the Divide Resource Area for fiscal year 1982 was approximately $130,000.

Yes, wool incentive payments are included in the income side of the profile.



24

WYOMING STATE
GRAZING BOARD

CENTRAL COMMITTEE
P.O. Box 200 Cheyenne, Wyoming 82001
(307) 638-3942

August 2, 1983

Mr. Dave Walter
Rawlins District Manager
P. O. Box 670
Rawlins, Wyoming 82301

Dear Dave:

We understand that a small number of individuals and groups, including the N.R.D.C., have recently criticized the Divide Draft Grazing E.I.S. and have stated that the document does not meet C.E.Q. requirements for an E.I.S. statement. We would like to state that we completely disagree with that minority position and would like to again express our general support of the document. We would also like to convey our support for the public participation process used to develop the Divide EIS, and we encourage the Bureau to reject counter-productive comments submitted by outsiders who did not avail themselves of the opportunity to work with the EIS Team during the development of the document.

In our opinion, the draft does present, either in the document or by reference to data held on file, an adequate amount of baseline resource information. Comments that the BLM must set stocking rates for allotments in an EIS prior to the point when adequate monitoring and other credible information on this subject is available suggests a complete lack of understanding of the principles of rangeland management. This EIS correctly recognizes that the carrying capacity of the range is dynamic from season to season, year to year, and not a static number for which no consensus ever exists.

Consultation between the permittees is the only way to come up with management ideas and proposals which will work. The Draft EIS contains information on the environmental

Dedicated to the wise use of Wyoming's Section 3 grazing lands.

LETTER NO. 24

Letter 24 was received approximately 3 weeks after the closing of the public comment period, when the EIS was going into final printing. Your comments will be considered in subsequent grazing decisions in the Divide EIS area.

consequences of various types of technically feasible management actions in this part of Wyoming, and we look forward to working with the BLM to implement these types of management actions on allotments where they are needed.

In our opinion, the Draft evaluates a reasonable set of alternatives to the proposed action, and addresses both the N.E.P.A. and the C.E.Q. regulations on this issue. No one, except the B.L.M., can complete the evaluation of a no-grazing alternative, and we question their "environmental" motives on this issue. We agree with, and support, your efforts to prepare a document that is more than an academic exercise in paperwork.

The Rawlins BLM, and others, have invested a lot of time and money in the EIS process to date, and the EIS team should be commended for doing a good job on a very difficult task. The present document provides an adequate framework for future progress and cooperation in the management of allotments in the EIS area. Now that the EIS is well underway, we need to once again see BLM employees in the field, working with us on some real issues. We would much better situation than what they were tied to a desk turning out paperwork.

Please let us know how we can be of assistance on this issue.

Bob Grieve

Bob Grieve, Chairman
Wyoming State Grazing Board

BG/jt

TEXT CHANGES AND ADDITIONS

Page 1. First paragraph, first sentence should read: "This EIS is an analysis of the effects of proposed and alternative livestock grazing management on approximately 2,099,160 acres of public land administered by the BLM Rawlins District in Wyoming."

Page 2. Column 1, pargraph 3, add the following after the last sentence:

> Management of wildlife populations would continue through harvesting authorized by the Wyoming Game and Fish Department, and the maximum population levels would remain as they are in the Wyoming Game and Fish Department's strategic plan (Draft 1981).

Page 2. Second column, under No Action, first line should read, "Under this alternative..."

Page 4. Table S-1 has been changed to reflect different cost/benefit ratios and changes in the Enhanced Livestock Grazing Alternative.

Page 8. First column, second paragraph, lines 6 and 7 should read, "...to show the results of present management..."

Page 19. Table 1-8, change third column heading to read, "Optimum Management Level."

Page 20. First column, the word "maximum" (lines 3, 5 and 21) should be changed to the word "optimum."

Page 20. First column, line 2, delete "Average—400."

Page 20. First column, second paragraph, line 5, delete "Average—70."

Page 20. First column, add the following at the end of the first sentence of the third paragraph. "The area east of Wyoming Highway 789 contains a large amount of fencing, which causes several problems. Many of the horses no longer exhibit the characteristics of wild and free roaming horses, such as flight from man, and act more like domestic horses. Also, there has been an unacceptable level of damage caused by the horses to the fences and to private property, and an excessive number of horses have had to be destroyed as a result of injuries from these fences. Delete, "The area east...is not possible."

Page 20. Second column, replace paragraphs five and six with:

> The management actions for this factor would vary, depending on whether the distribution problems were caused by lack of water or concentration of grazing animals on riparian areas. On allotments where lack of water is found to be the problem, additional water sources will be developed. Once additional water sources have been developed, the monitoring would indicate whether the problems have been corrected or additional development would be needed.
>
> On allotments where sufficient water is found available but the livestock has been concentrating too heavily on riparian areas, grazing systems and/or fencing will be implemented. Total exclusion of livestock grazing for several years might be required to improve the condition on riparian areas, wetlands or meadows.

Page 21. First column, first paragraph, line 9 should read, "season-of-use would be ..."

Page 23. Second column, the following insert should follow paragraph 2.

NATIONAL PARK SERVICE

The National Park Service administers the National Natural Landmarks and the the Nationwide Rivers Inventory programs. The proposed range management program should have no effect on the lands under either of these programs. However, BLM will consult with the National Park Service any time an action is proposed that might have any impact on these lands under either of the two programs.

Page 24. Column two, paragraph two has been deleted and replaced by the following paragraph "Permits are required from the State Engineer for all water developments or development modifications: springs, stock ponds, wells, and reservoirs."

Page 27. First column, second paragraph has been changed to read:

> 3. To prevent erosion, land treatments would be analyzed on a case-by-case basis to determine the maximum percent of slope on which the treatment could be completed. Bureau guidelines, safety, and specific site characteristics would be primary considerations.

Page 38. First column, third paragraph, first sentence has been amended to read: "Gibben's beardtongue and persistent sepal yellowcress are candidates for listing as threatened and endangered."

TEXT CHANGES AND ADDITIONS

Page 43. Second column, second paragraph has been changed to read as follows: "There would not be any impact to any threatened or endangered species within the EIS area as a result of the Proposed Action."

Page 45. First column, first paragraph has been changed to read: There would not be any impact to ratio should read "1.78 to 1.83."

Page 47. Second column, line two should read "are allotment 0451,..."

Page 55. Column one, the heading "HYDROLOGY" has beendeleted and replaced with the heading "WATER RESOURCES."

Page 61. Second column, first paragraph, line three should read, "when they are approximately..."

Page 63. First column, fourth paragraph, line four should read, "of the economic situation."

Page 63. Second column, first paragraph, line one should read, "BLM's grazing fee..."; line five should read, "Taylor Grazing Act..."; line eight should read, "U.S. Treasury's ..."

Page 63. Second column, first paragraph, add "Although BLM does not recognize a capitalized value for grazing preferences, public land forage..." after the first sentence.

Page 67. First column, first paragraph, line nine, delete comma after "education."

Page 67. Second column, last paragraph, last line should read, "under this alternative..."

Page 69. First column, line two, delete "alternative."

Page 72. Under Methodology heading, last paragraph, line one, take "s" out of BLM AUMs."

Page 72. Under Methodology heading, last paragraph, line three, should read "...and reconstruction of range..."

Page. 72. First column, fourth paragraph should have the following addition: "Since the DEIS was completed, additional information has become available regarding the benefits associated with range improvements." This information is incorporated into the new benefit/cost ratios shown on pages 72 and 73.

Page 72. Second column, first paragraph, line four should read, "ranged from 2.33 to 2.47."

Page 72. Second column, first paragraph, line three, add a "/" to benefit/cost.

Page 72. Second column, second paragraph, line seven, the benefit/cost has been deleted.

Page 72. Second column, fourth paragraph, line three, the benefit/cost ratio should read "...would have a benefit/cost ratio ranging from 2:47 to 2.49."

Page 73. First column, first paragraph, line two, the benefit/cost ratio should read "1.9 to 1.0."

Page 75. Second column, second paragraph, three and four, should read "susceptible to alteration..."

Page 75. Column two, paragraph five, line 1, the "Seminoe" has been deleted.

Page 76. Column two, line one, the word "Seminoe" word lines any threatened or endangered species within the EIS area as a result of the Proposed Action.

Page 79. First column, paragraph two, last sentence should read, "Extensive migrations between the various seasonal ranges that have been documented for the Ferris and Baggs herd units (Springer and Wenger 1981; Compton 1975; and the Wyoming Game and Fish Department 1979)."

Page 79. Column two, paragraph two, line eight has been changed to read: "Preferred habitat types have an average ground cover of 50 percent and an average vegetation height of 15 inches (Yoakum 1978). The riparian grassland, shortgrass steppe, and the sagebrush-mixed grass habitat types are the preferred spring, summer and fall habitats.

Page 79. Column two, delete the last sentence of paragraph two and add the following to paragraph two: During severe winter weather, pronghorn concentrate on key winter ranges. They select areas of vegetation and topography which minimize the effects of the cold and wind. The sagebrush-mixed grass and big sagebrush-rabbitbrush habitat types are preferred in the winter, with the greasewood type also receiving occasional, heavy use. Cover requirements for the winter season are greatly dependent on topographic features and the plant communities. The most important characteristics are rough, broken terrain where prevailing winds expose vegetation on ridgetops and where more hospitable microhabitats are available on the leeward sides of the terrain (Bruns 1977).

TEXT CHANGES AND ADDITIONS

Extensive pronghorn migrations between seasonal ranges have been documented for the Red Desert herd unit (Deblinger, personal communication 1982) and the Baggs herd unit (Irvin et al. 1981; Moody, personal communication 1982).

Pronghorn diets have been estimated by Taylor (1972 and 1976) in the Red Desert and South Ferris herd units. They were based on feeding site observations and rumen analysis. Taylor estimated that the average yearlong diet consisted of 76 percent browse, 17 percent forbs, and 7 percent grass and grass-like plants. Browse use was highest in the winter (96 percent) and lowest in the spring (50 percent). Forbs were utilized most in the summer (38 percent) and least in the winter (2 percent). Grass and grass-like species were used most in the spring (18 percent) and least in the summer and winter (2 percent). The most heavily utilized plant was Wyoming big sagebrush, which received use during all seasons.

Page 83. First column, fifth paragraph, line two should read, "beneficial effects when the ..."

Page 85. Second column, first paragraph, line 14 should read, "large population losses may..."

Page 86. Column one, delete paragraph 3, which states:"If energy related..."

Page 89. First column, first paragraph, line five should read, "The result would be that those areas with a downward trend would continue the downward trend while those areas in an upward trend would continue this upward trend."

Page 89. First column, third paragraph, line five should read, "wildlife community."

Page 95. First column, first paragraph, line nine, change "15,810,000 pounds of forage" to "20,270 AUMs."

Page 96. First column, fifth paragraph, line 12, change to, "If monitoring results indicated overuse of the range by wild horses, wild horse numbers would be adjusted downward accordingly."

Page 97. Second column, first paragraph, sentence has been changed to read, "If monitoring data indicated overuse of the range by wild horses, wild horse numbers would be adjusted."

Page 98. Second column, first paragraph, line nine, insert the following sentence after the third sentence: "Important nongame species include the roundtail, flannelmouth sucker, and the bluehead sucker."

Page 103. Second column, last sentence under Irreverisble and Irretrievable Commitment of Resources should read, "Such losses would be irretrievable."

Page 149. Glossary. Under Carrying Capacity, "vegetation or related."

Page 151. Under Fine-Textured Soil, "Sandy Clay, silty clay..."

Page 154. Under Sacrifice area, "...that is intentionally..."

Page 155. Under Vegetative Parameter, "A vegetative characteristic...to describe the vegetative community."

Page 158. References Cited. Under Davis, J.W. 1982, "relationships symposium..."

Page 158. References Cited. Second column, add: Gebbardt, K.A. *Use of erosion models on western rangelands.* Unpublished Rept., Idaho State Office, BLM, USDI, Boise.

Page 159. Under Knowles, C.J., "symposium" is misspelled.

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